

General Assembly  
Legislative Hall  
411 Legislative Avenue  
Dover, DE 19901

October 18, 2021

Good evening, House Majority:

Thank you for this first and final opportunity for public input regarding the House Majority's proposed redistricted maps, released just three business days ago. While state and federal law provide criteria for which the House should use in determining the boundaries of the several representative districts within the State, the proposed map demonstrates the House Majority's use of extraneous criteria that often undermines the spirit of the law and divides communities of interest.

Specifically, several of the draft districts that divide communities of interest preserve incumbents' addresses just barely within the proposed boundaries. Consideration of any incumbent's address during map-making unduly favors that incumbent's chances for reelection and should never be a consideration that outweighs preserving the voting strength of a community of interest. Yet, time and again, when an incumbent's address is on the edge of a proposed district, the consequence is that a community of interest is divided. We have identified fourteen proposed districts with "border incumbents" that split at least twelve communities of interest:



AMERICAN CIVIL LIBERTIES UNION

Delaware

100 W. 10th Street, Suite 706  
Wilmington, DE, 19801  
302-654-5326  
[www.aclu-de.org](http://www.aclu-de.org)

Kathleen Epler  
President

Mike Brickner  
Executive Director

Susan L. Burke  
Legal Director

District	Split Communities of Interest
1	Wilmington; Edgemoor
5	Bear
6	Edgemoor
9	Middletown
11	Middletown; Smyrna
12	Wilmington
15	Bear; Glasgow; Saint Georges

16	New Castle
21	Pike Creek; Hockessin; North Star
26	Bear; Glasgow
27	Bear; Glasgow
28	Smyrna; Dover
29	Smyrna; Dover
31	Dover

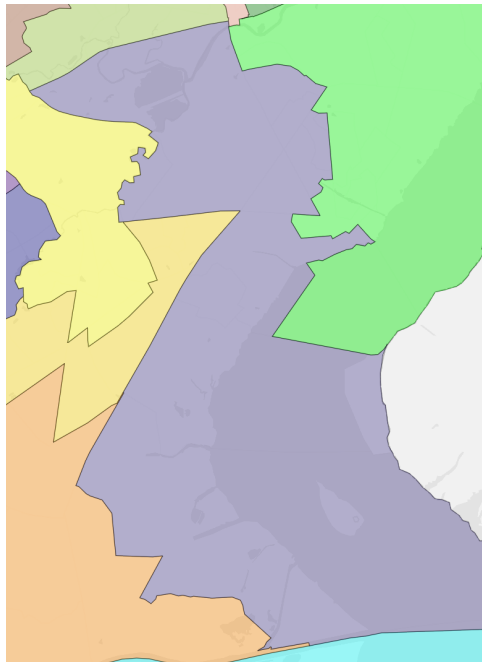
While the population of Dover and Wilmington necessitates more than one representative district within their municipal boundaries, Wilmington is split six times and Dover is split four times, more than twice the number of divisions necessary, respectively. For all of the other communities of interest listed, their populations could easily be unified within a fraction of a single representative district.

Using incumbent’s addresses has also resulted in several non-compact districts, with some of the most egregious examples as follows:

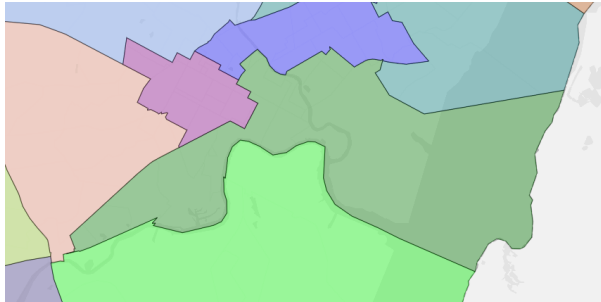


## Delaware

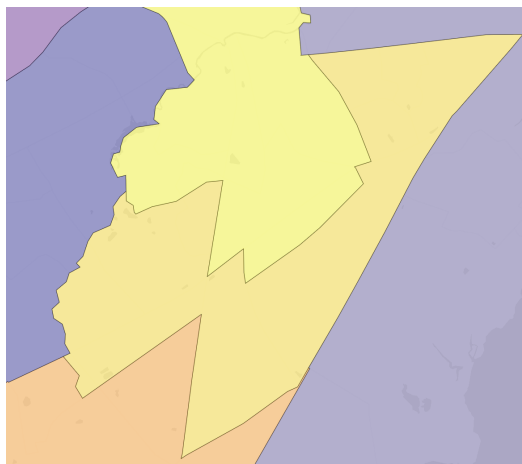
District 17: “Washington Crossing the Delaware”



District 2: "Megaphone"



District 5: "Wu-Tang Clan" Logo



Delaware

We encourage the House to adjust the proposed district boundaries such that communities of interest are preserved within single compact districts to the greatest extent practicable, without regard to incumbent legislators' addresses.

/s/ Dwayne J. Bensing

Staff Attorney\*

American Civil Liberties Union of  
Delaware

302.654.5326 ext. 105

[dbensing@aclu-de.org](mailto:dbensing@aclu-de.org)

\*Certified Limited Practice Licensee