

MEMORANDUM

To: Ohio Redistricting Commission

From: Stephen Michael Kellat

Subject: Written Testimony Relative To Congressional Maps

Date: February 23, 2022

I regret that I am unable to appear before the Commission at its meeting today. Ecclesiastical business requires my direct attention in Ashtabula County. I am the sponsor of a submitted map and will provide general discussion as best I can.¹

In keeping with the Commission's observed practices so far, the map that I submitted on September 30th last year will be referred to as "Kellat II".² My original submission on September 19th has a variety of fatal defects and is otherwise superseded. In keeping with the notions of Free/Libre Open Source Software development I had tried to "release early, release often". Even if it wasn't a completely correct map it was better that I have *something* out there instead of waiting for perfection.

The map was submitted in September and with the lack of information at-hand then it was as close to constitutional as I understood then. I have not updated the map to take into account the opinion of the Supreme Court of Ohio as announced in *Adams v. DeWine*.³ The map may not completely meet the Court's standards today.

Unfortunately the only mapping software I have access to happens to be Dave's Redistricting. The Kellat II map visible there is predicted by Dave's Redistricting to lead to eight Republican-leaning districts, four Democratic-leaning districts, and three that Dave's deems "competitive". Out of those three deemed competitive two lean slightly Democratic and one would be nearly evenly matched. As Dave's doesn't work with the correct data set used for evaluation of partisan index that recap is not necessarily accurate on my part. It is what we have, though.

In terms of drawing districts I kept similar shapes to districts *if possible*. Since we lost a district that results in territory changes rippling across the map that result in there being no simple set of changes. Taking that in addition to the firm rules that require certain cities not be split create some pressures in map design that result in necessary boundary changes. Whether we like it or not some people will be introducing themselves to entirely new congressional candidates in the primary.

¹For the sake of the record I will also note that I have an earned master's degree in library science from Clarion University of Pennsylvania, an earned bachelor's degree in history from Rochester University outside Detroit, an earned associate's degree in Emergency Management and Planning Administration from Lakeland Community College, and an earned associate's degree from Kent State University Ashtabula. I previously worked as a civil servant in the United States Treasury serving our fellow Americans from sea to shining sea in resolving tax problems. I also have prior experience as a faculty-rank librarian in higher education. In terms of political experience I lost to my challenger from the Democratic Party in the race last November for the Ward 4 seat on Ashtabula City Council.

²The map is available for download from the Commission's maps repository at <https://redistricting.ohio.gov/assets/district-maps/district-map-218.zip>.

³See: *Adams v. DeWine*, Slip Opinion No. 2022-Ohio-89.

A major change made in my map compared to status quo was to associate Ashtabula County with Trumbull and Mahoning counties rather than where it sits now for a congressional district. This is not unheard of in Ohio history. The executive director of the Democratic Caucus in the Ohio Senate posted to Twitter a picture of the state's congressional districts map from 1913 that shows the three counties together in one district.⁴ Ashtabula County is part of the Eastgate Council of Governments regional planning organization in contrast to the rest of its present congressional district being part of the Northeast Ohio Areawide Coordinating Agency.

The change to shift Ashtabula County out of its present district alignment more towards Trumbull and Mahoning is reflected in the model maps being put forward by Fair Districts Ohio.⁵ I inquired when they put their maps up for comment if they could incorporate that change and they attempted to do so. This is not an impossible change to make as the three map variants that were being discussed at the time were able to handle the change.

I regret not being there in-person to be able to answer any questions. The map is available on Dave's Redistricting for ease of viewing at <https://davesredistricting.org/join/98f59007-5602-44ed-8372-fa6891c5acf6>. We all need to work to avoid the nightmarish scenario discussed in Attorney General Yost's letter of February 22nd where we wind up with plurality elections for congressional seats at-large state-wide.⁶

⁴See: https://web.archive.org/web/20220118193041/https://twitter.com/Simon_D_Dallas/status/1483520964180783104.

⁵Common Cause Ohio presents discussion about the model map at <https://www.commoncause.org/ohio/press-release/fair-districts-ohio-unveils-a-model-congressional-map/>.

⁶Josh Rultenberg posted a copy of the letter to Twitter at <https://twitter.com/JoshRultNews/status/1496238990508314624>.