



## Michigan Independent Citizens Redistricting Commission (MICRC) Memo #3 — Recommendations for Managing and Analyzing Public Input in Future Rounds of Michigan Redistricting

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### Executive Summary

This memo provides a comprehensive analysis of the CLOSUP team's work in assisting the Michigan Independent Citizens Redistricting Commission (MICRC) in the analysis of public comments submitted during the 2024 Senate Mapping Redistricting process. The goal of this memo is to detail the public comment process and provide recommendations for managing and analyzing public input for future iterations of the CLOSUP team and the MICRC. Given the lack of research on independent redistricting commissions like the MICRC, this memo likewise can provide key insights for academics and other states on the best practices for organizing and analyzing public comments in redistricting.

The memo first provides background on the MICRC, outlining research on the best practices for public engagement and incorporating Communities of Interest (COIs) into redistricting. Next, the memo describes the team's process in collecting, coding, and analyzing the thousands of public comments it received in May and June 2024. At the request of the MICRC, the team prepared two memos. [The first memo](#) analyzed the relevant COIs described in public comments to assist the MICRC in preparing their draft maps. After the MICRC completed twelve draft maps for further public commentary, [the second memo](#) analyzed the net public support for each of the maps.

Finally, this memo provides the CLOSUP team's reflections and recommendations for the future. In general, the team recommends the MICRC remain committed to its "bottom-up," community-driven approach to public comments and COIs. Based on the limited research into redistricting commissions, this approach is the most effective means of incorporating public comments into district lines. In order to support the commission, future aides should 1) build a flexible codebook that can adequately capture trends and summarize public comments, 2) utilize AI with active human oversight and review, or other mass data techniques, to efficiently and accurately assess comments, and 3) report on the data throughout the process.

### Key Takeaways

- The CLOSUP team analyzed public comments for the Michigan Independent Citizens Redistricting Commission (MICRC) during the May and June 2024 state senate redistricting process. The team prepared two memos for the MICRC:
  - » [Memo 1](#) presented relevant communities of interest (COIs) in Metro Detroit
  - » [Memo 2](#) analyzed the "net-favorability" of the 12 draft Senate maps
- The four-person team (three analysts and a liaison to the commission) had two steps for each memo: (1) comment collection/aggregation and (2) comment analysis
  - » Comment collection required aggregating and sorting comments from the MICRC's two online portals and from meeting transcripts
  - » Comment analysis required "coding" the comments into common themes, analyzing their frequency, and presenting relevant takeaways and data trends
- Most effective comment analysis strategies
  - » Solicit Word document versions of meeting transcripts from MICRC
  - » Divide comments for review, flagging unclear comments for secondary review
  - » Create unique IDs for individual commenters
  - » Use AI early with human oversight for a more consistent means of coding comments
  - » Meet weekly to discuss trends and update codebook as necessary
- Future recommendations for MICRC and CLOSUP team
  - » Adhere to thematic, bottom-up COI and public input philosophy
  - » Build and update a flexible and responsive codebook for public comments
  - » Leverage artificial intelligence with human oversight for demanding datasets

## Background

### **Michigan Moves to Incorporate Public Input into Redistricting Processes**

In 2018, Michigan voters approved a constitutional amendment via statewide ballot initiative that shifted the responsibility for drawing Michigan's congressional and state legislative districts from the Michigan Legislature to a newly-formed Michigan Independent Citizens Redistricting Commission. This marked a new approach to redistricting in the state, maximizing public input and, for the first time in Michigan, incorporating communities of interest. Beginning in 2020, the bipartisan commission solicited public comments before drawing Michigan's districts.

The Commission adopted its first set of maps in December, 2021, which were used in the 2022 election. However, in late 2023, a federal court ordered the commission to redraw 13 Detroit-area districts (many of which included portions of Wayne, Oakland, and Macomb counties) after finding they used race as a predominant factor while redistricting, which violates the 14th Amendment.<sup>1</sup> In May 2024, the Commission hired a team of researchers at the Center for Local, State, and Urban Policy (CLOSUP) at the University of Michigan to support the redrawing process by systematically aggregating, managing, analyzing, and presenting findings on the extensive public comments submitted to the MICRC.

The following memo uses this case study to highlight recommendations on collecting, analyzing, and reporting on public comment for future independent redistricting commissions.

### **Best Practices in Public Engagement**

To ground the recommendations and case study, the CLOSUP team examined best practices for public engagement in state and local governments. While the team initially hoped to find specific recommendations for public comment data collection and analysis in redistricting, this research was limited. Therefore, the team pulled best practices from general public engagement. This research reveals a focus on fostering transparency, inclusivity, accessibility, and responsiveness.

Involve the Public Early. Government agencies should involve the public early in the decision-making process, before plans are fully finalized. This early involvement allows community input to be genuinely integrated into decisions and provides ample time for community members to engage.<sup>2</sup> Building and maintaining continuous relationships with the community—rather than only during specific projects—is especially effective.

Offer Diverse Opportunities for Engagement. To gather public comments, it is important to offer a variety of in-person and online engagement opportunities, such as town halls, virtual meetings, open houses, forums, email, and online portals. Live meetings should be scheduled at different times (daytime, evenings, weekends) and held in various locations (or virtually) to accommodate diverse schedules and access to technology.

Provide Context for Effective Feedback. Providing background information and context is essential to help participants fully understand the issues under discussion. This can be done through materials like videos or FAQs that explain what types of comments will be most valuable to the decision-making process.<sup>3</sup> These resources can also offer general information on the public comment process and how submitted feedback will be considered.

Ensure Transparent Communication and Outcome Reporting. Clear communication about how decisions are made, who is responsible, and the influence of public input on outcomes is crucial. Engagement results should be well-documented and shared publicly, including details on what was said, what was decided, and why. For example, if

certain comments are classified as repetitive, mass-produced, or computer-generated, this should be transparently reported in the analysis.<sup>4</sup>

**Leverage Technology.** Utilizing technology for broad outreach, data collection, and analysis is essential. The Administrative Conference of the United States (ACUS) recommends that staff be trained on new technologies for processing large volumes of comments. These technologies can expand opportunities for public participation and lower barriers to accessing public comment portals, allowing a more diverse and representative group of people to engage. Additionally, technology can assist in analyzing large datasets of public input and identifying automated or computer-generated comments.

**Implement Regular Evaluation and Improvements.** Finally, it's important to regularly evaluate the effectiveness of engagement efforts. Gathering feedback from participants on the engagement process itself can reveal areas for improvement. Government agencies should also track participation rates, demographic diversity, and satisfaction levels to ensure ongoing improvement. Based on these evaluations, strategies should be adapted as needed.

The MICRC case study proves as a knowledge source for governments of how these best practices in public engagement can be expanded upon for public comment analysis for independent redistricting commissions.

## **Approaches From Other Commissions on Redistricting**

Although there are few truly independent redistricting commissions like the MICRC, the CLOSUP team surveyed the approaches of other commissions when incorporating COIs into their redistricting processes. There is limited research on this topic: only a handful of academic articles have appraised how commissions solicit and incorporate feedback into their mapping. Moreover, there is no research on the kind of work undertaken by the CLOSUP team of organizing and “coding” public comments for commission use. Nonetheless, it is worthwhile to study what we can from other states handling a similar criterion.<sup>6</sup>

### **What is a Community of Interest?**

Communities of interest are a malleable concept in every state that recognizes them. Generally, incorporating COIs is intended to ensure that legislatures actually reflect the heterogeneous policy interests of diverse voters. The most coherent legal definition of COIs comes from Professor Nicholas Stephanopoulos's concept of a territorial community: “(1) a geographically defined group of people who (2) share similar social, cultural, and economic interests and (3) believe they are part of the same coherent entity.”<sup>7</sup> CLOSUP's 2020 recommendations to the MICRC further suggested that, for the purposes of redistricting, COIs should be associated with public policy interests that can be affected by legislation.<sup>8</sup> The Alaskan Supreme Court recently adopted Stephanopoulos's definition of COIs as part of its decision to outlaw partisan gerrymandering under the Alaskan Constitution.<sup>9</sup> Precisely what is required to meet this and other local definitions of COIs is unclear. However, the Supreme Court has recognized as recently as 2023 that poorly supported, pretextual COIs will be subject to legal scrutiny.<sup>10</sup>

### **How States and Commissions Handle COIs**

Given that COIs are highly contextual, states typically leave local definitions open-ended. Instead of setting specific definitional requirements, states that use the criterion will merely determine a final arbiter of legitimate COIs. As the MICRC did, some states undertake a “bottom-up” approach, where the communities themselves self-identify

to the relevant redistricting officials.<sup>11</sup> Others use a “top-down” approach, in which the redistricting officials, typically legislators, make decisions on qualifying and relevant COIs.<sup>12</sup>

California, the state with a commission most similar to the MICRC, uses a bottom-up approach. California’s Citizens Redistricting Commission (CCRC) solicits extensive public comment through its online portal and its large support staff.<sup>13</sup> The CCRC relied on its staff to work through the many thousands of public comments it received, allowing the CCRC to effectively read every individual comment. Moreover, the CCRC continued to provide in-person and remote hearings for public commenters, often allowing community representatives to demonstrate their COIs over Zoom.<sup>14</sup> Other states that utilize bottom-up approaches to redistricting (but do not have independent commissions) similarly use Zoom and public comment portals to solicit public feedback.<sup>15</sup>

Michigan’s 2018 constitutional amendment specifies that COIs are not the same as local government jurisdictions (e.g. cities, counties, etc.), and it requires the MICRC to prioritize COIs above protections for local jurisdictions. By comparison, a number of state commissions, including California’s, are different from the MICRC in a fundamental way: their constitutional or statutory criteria allow jurisdictional lines (city limits, county lines, etc.) either 1) to be used as a stand-in for a COI or 2) to be considered at the same level of priority as a COI. In California’s case, per limited research on the topic, the equal standing of jurisdictional lines to COIs caused some confusion among the commission, as it became difficult to distinguish the two distinct yet equal criterion.<sup>16</sup> However, unlike the MICRC’s constitutional criteria, the CCRC was not constitutionally required to place COIs higher than jurisdictional considerations.

Among other states with independent redistricting commissions, Arizona’s process for incorporating COIs appears to be the most top-down and commissioner-driven. Arizona’s redistricting process is fundamentally different from the MICRC’s or CCRC’s, as commissioners work through a “grid-like pattern” of pre-set, introductory district boundaries, making adjustments to that grid based on relevant redistricting criteria (COIs included).<sup>17</sup> District boundaries are the result of adjustment of equally populous districts, not original drawing. Based on a sampling of transcripts, commissioners appear to drive the COI process without the specific support of public comment.<sup>18</sup> Although there is no specific research into the Arizona commissions approach, its top-down COI process appears more ad-hoc compared with the bottom-up approaches in Michigan and California.

## Case Study: CLOSUP and MICRC

### CLOSUP Team Approach

In May 2024, the MICRC engaged the CLOSUP team in their redistricting process to ensure a thorough and objective examination of public comments, facilitating the Commission's efforts to incorporate community feedback into the redistricting process. Given the substantial volume of public comments received, the short timeline available for the Commission's re-mapping work, and the time required to employ effective collection and summarization strategies, the team's role was critical, as the Commission could not feasibly undertake this task independently.

After initial communication with the Commission leadership, the CLOSUP team worked independently to conduct analyses in two distinct phases. MICRC leadership requested focus on communities of interest first, and then a specific focus on map preferences based on public feedback for the Commission's twelve draft maps. In each phase, the team compiled comments from various sources—including in-person and Zoom public meetings, emails, letters, and online portals—into a single comprehensive database. This allowed for a comprehensive and systematic analysis of patterns and trends in public opinion. The team then produced detailed memos summarizing their findings and presented these during public MICRC meetings.

This process was not intended to influence Commission members towards a specific outcome or “correct map,” but rather to ensure that the entirety of public opinion data was accessible and available to Commission members. The CLOSUP team's memos were designed to help the commission see the larger picture and make decisions informed by qualitative data. During presentations, members of the public and MICRC commissioners had the opportunity to ask questions, fostering a deeper understanding of the analyzed data and its implications for the redistricting process.

### Methodology

The CLOSUP team developed and employed a detailed coding methodology to analyze public comments across two phases of the redistricting process, documented in two separate memos delivered to the MICRC. This section outlines the methodologies used in each phase and their integration to provide a comprehensive analysis.

#### **Memo 1: Initial Comment Collection and Coding**

The CLOSUP team analyzed 217 public comments from 103 individuals submitted between March 21 and May 14, 2024, on the proposed redistricting maps for Wayne, Oakland, and Macomb Counties. The CLOSUP team aggregated public comments from three sources: MICRC meetings, the Michigan Mapping Public Comment Portal, and the My Districting Mapping Portal. Each comment was added to a database, capturing details such as the date of testimony, location, commenter's name and residence (if provided), and whether the commenter represented themselves or a group. Unique Commenter ID codes were assigned to track multiple submissions by a single commenter. The comments were coded using the CLOSUP codebook (available in full in the [Memo 1 Appendix<sup>19</sup>](#)), which contained five categories of codes to represent the public comments: (1) the commenter's home region; (2) community of interest (COI); (3) procedural mapping comments; (4) substantive mapping comments; and (5) miscellaneous comment categories. The team used the existing codebook from earlier student drafts built during the MICRC's original 2020–21 redistricting cycle and updated it with new codes where necessary. Most comments were assigned several codes to reflect the multiple requests and insights of the comment. For example, a comment from a Dearborn resident might argue that they are part of a Middle Eastern and North African (MENA) COI and ask the Commission

to keep Dearborn and their COI whole (within a single district) in the map. This comment would receive codes 113 (Dearborn/Dearborn Heights region), 201 (MENA COI), 410 (prioritize keeping COI whole), and 411 (prioritize keeping jurisdiction whole).

The team focused in particular on comments with codes 406 (concern that maps mishandle jurisdiction boundaries), 407 (concern that maps mishandle COIs), 410 (prioritize keeping a COI whole), and 411 (prioritize keeping jurisdictions whole). Although the MICRC constitutional criteria places COIs much higher than jurisdictional boundaries, many commenters articulated their COIs in terms of their jurisdiction, thus introducing some of the same challenges that California's Commission experienced. As such, the team re-reviewed comments with these codes and analyzed the testimony for recurring themes. For the purposes of analyzing, writing, and presenting the memo, the team split the comments internally based on the three major counties at issue in the redistricting: Wayne, Oakland, and Macomb.

The University of Michigan GPT AI service was used to initially analyze and assign codes. First, the team created succinct summary sentences for each public comment ("Keep Detroit and Warren separate because of infrastructure" or, "Keep Detroit together to prevent diluting the vote and disenfranchisement.") to provide the U-M AI clear, consistent data. Second, the team asked the AI a series of prompts in order to summarize those sentences. Information extracted from U-M GPT was subsequently cross referenced in the public comment database by members of the CLOSUP team to verify the accuracy of the AI's output. Although the team members hand-coded every comment in the database, there were simply too many comments to offer an unbiased and complete analysis of the feedback. Nonetheless, the team made necessary corrections to the AI's responses summarizing the map preference trends in the below map-specific findings.<sup>20</sup>

### **Memo 2: Map Preference Coding**

In the second report to the MICRC, the CLOSUP team analyzed 1,463 public comments from 415 individuals submitted between May 21 and June 21, 2024 on the twelve proposed state senate maps for Wayne, Oakland, and Macomb Counties. The CLOSUP team followed the same coding methodology as it did in its May memo, with an updated codebook category to analyze respondents' specific draft map preferences. In the CLOSUP codebook, each of the twelve draft maps was assigned a "600" series code, with decimal subcodes indicating support (6xx.1), opposition (6xx.2), or suggested modifications (6xx.3). For example, support for the "Szetela map" was coded as 611.1, while opposition to the "Dove map" was coded as 603.2. The team calculated each map's net favorability by subtracting unique dislikes from unique likes, ensuring each individual commenter could only affect a map's count once.

The University of Michigan GPT AI service was again used to synthesize broad trends specific to each map once these comments were summarized. Similarly to its methodology for [Memo 1](#), the CLOSUP team provided a human review to confirm and modify as needed the AI's findings.

Another updated feature of [the second memo](#) included a regional analysis. The CLOSUP team analyzed the relationship between commenters' locations and their mapping preferences, providing a regional breakdown of preference for each individual map.

By combining these methodologies in two separate phases and incorporating all public comments across their multiple input paths, the CLOSUP team provided a comprehensive analysis of public sentiment regarding both the redistricting process and specific map preferences. The initial phase focused on thematic content (especially COIs) and jurisdictional concerns, while the second phase quantified support for draft maps. Together, these approaches

allowed for a nuanced understanding of public input, ensuring both qualitative insights and quantitative preferences were accurately represented in the final analysis.

## **Key Public Concerns**

This section presents broad insights about public concerns derived from the CLOSUP team's examination of public comments submitted to the MICRC. For a more detailed exploration of CLOSUP's findings, please refer to [Memo 1](#) and [Memo 2](#).

Jurisdictional Integrity: Keeping jurisdictions whole emerged as a top priority for commenters across both phases. Again, this somewhat replicates the California experience. Public comments frequently cited the townships, counties, and neighborhoods in which they lived, worked, and spent time in as communities that should be kept together. Many commenters articulated their communities of interest (COIs) in terms of their jurisdictions, highlighting the interconnectedness of these concerns. It is unclear if this pattern will continue in future rounds of redistricting, or whether more experience with the still-new concept of COIs in Michigan will eventually lead to more nuanced definitions of COIs that may cross jurisdictional boundaries.

Communities of Interest (COIs): Preserving COIs, particularly ethnic and cultural communities, was consistently emphasized throughout both phases of public comments. COIs mentioned were wide-ranging in definition, including but not limited to:

- Racial and ethnic minority groups (for example, Middle Eastern and North African (MENA) community)
- LGBTQ community
- Environmentally-focused watershed communities
- Religious groups
- Economic and industry-based communities

In the second phase of public comments, many respondents voiced specific concerns about maps diluting the voice of a COI or expressed support for maps they believed preserved important COIs.

Partisan Fairness: This became the most prominent concern in the second phase of public input from May 21 through June 24, with commenters advocating for competitive districts (despite this not being a criterion in the constitutional amendment), statewide partisan fairness, and transparent metrics. Many advocated for maps solely on the grounds of high partisan fairness scores, metrics based on redistricting criteria provided by MICRC.<sup>21</sup> Some commenters perceived a conflict between incorporating COI concerns and achieving partisan fairness.

Procedural Concerns: Throughout both phases, commenters raised issues relating to the redistricting process itself:

- Transparency in the Commission's decision-making process
- Adherence to constitutional criteria for redistricting<sup>22</sup>
- Concerns about potential advocacy campaigns influencing public comment

## Process Reflections

Throughout the extensive process of aggregating, analyzing, and presenting public comments, the CLOSUP team maintained a rigorous and collaborative approach. The team met weekly, and often more frequently, to discuss coding strategies, identify emerging trends, and refine analytical methods. This regular cadence allowed for a continuous improvement of methodology. The three analysts divided the workload, each taking responsibility for specific sets of comments and drafting distinct sections of the memo. Individual public comments were frequently reviewed by two or even all three of the analysts, as needed. The team then reconvened to review, refine, and integrate their individual contributions, ensuring a cohesive and comprehensive final product.

### Public Engagement and Data Collection

- The CLOSUP team analyzed a total of 1,680 public comments across two phases (217 in the first phase and 1,463 in the second phase) from 518 unique commenters, addressing 5,093 specific points. Public participation increased significantly between the two phases, with the number of unique commenters rising from 103 to 415.
- Multiple submission channels were used, including MICRC meetings, online portals, and written communications, with in-person meetings generating the most comments.
- The team prioritized neutrality in coding, documenting all comments received regardless of their origin or frequency. This meant balancing input from wide-scale organizing advocacy efforts (repetitive comments) against unique, detailed explanations of COIs or district concerns. To address this, the team implemented two key strategies: (1) identifying and counting unique commenters in addition to total comments, and (2) tagging comments associated with advocacy groups to provide context for organized efforts.

### Analytical Approach

- A detailed codebook was developed and refined throughout the process, allowing for consistent categorization of comments across various themes and regions.
- Leveraging a master database, the team developed Excel formulas to identify trends in comment types and commenter demographics, and creation of data visualizations to effectively communicate findings.
- An AI-assisted analysis to identify qualitative trends was followed by human verification and correction, ensuring comprehensive and accurate data interpretation.

### Process Implications

- The systematic approach to data collection/aggregation and analysis proved indispensable in managing the large volume of public input, especially given the short court-imposed timeline.
- The two-phase process across the May and June reports allowed for refinement of analysis techniques and captured evolving public sentiments as the redistricting process progressed.
- Follow-up questions from commissioners during public hearings proved valuable in eliciting more specific and useful information from commenters.
- Commissioners incorporated memos and data differently. To view a complete record of their conversations, view MICRC meeting transcripts here. ([link?](#))



## Recommendations for Future Public Comment Collection and Analysis

The MICRC case study, combined with best practice research and lessons from previous redistricting efforts, informs our recommendations for future redistricting commissions. These suggestions aim to enhance the accuracy and efficiency of public comment collection and incorporation, ensuring that redistricting decisions are well-informed and truly representative of public opinion. Our recommendations are designed to streamline the public input process, maximize the value of collected data, and improve transparency and accountability.

By implementing these recommendations, future redistricting commissions can better fulfill their mandate of creating fair and representative electoral maps while effectively engaging the public throughout the process.

### **Maintain A “Bottom-Up” COI Approach**

Based on the relevant research from other independent redistricting commissions, the MICRC’s bottom-up approach is the most effective means of incorporating authentic public input and COIs into the redistricting process. A bottom-up approach is the best means to actually protect COIs and avoid ad-hoc and uneven redistricting. However, the approach is likely more resource and time-intensive compared with a top-down approach as in Arizona. The organization and review of thousands of public comments requires adequate staffing, as commissioners generally do not have the time or capacity to review and recall all of the submitted comments.

Even with a capable staff, the flood of comments requires summarizing. We recommend a memo-style, “thematic” approach to COIs: reviewing staff should 1) individually analyze and categorize each public COI comment and 2) present key trends synthesizing the most prevalent themes that emerge from the data. The approach should mirror or build upon the CLOSUP team’s May 20, 2024 COI memo, in which the CLOSUP team individually reviewed each public comment, but presented the commission with the most important trends and takeaways. This ensures a community-driven, bottom-up approach, while still ensuring that commissioners are not spending too much time wading through public comments. Organizing these comments could be expedited by using AI, but the initial review of each comment should still receive a human reviewer to ensure accuracy.

### **Encourage Specificity and Sufficiency in Public Comments**

The most valuable public comments are those that are specific, providing succinct context and sufficient justification for their opinions. However, some comments either lack context or include an overload of information. While receiving live public comments during public hearings during the Michigan re-mapping process, MICRC Commissioners engaged commenters in follow-up questions. This was effective in eliciting deeper justifications and necessary context when needed and allowed for more accurate analysis of these public comments.

To build on this approach, commissions can implement more proactive tools. When submitting public comments, whether in-person or through an online portal, commenters should be required to complete an accompanying online form requiring more detailed information such as contact information, region, geographic boundaries of their COI, additional information regarding the substantive issues that define their COI, and reasons their COI requires legislative protection. This approach will ensure that commenters provide the necessary justification for their feedback, resulting in more consistent and valuable input.

Commissions could also consider providing example comments on their comment portals, pointing to key features of effective input, such as clarity, context, and justification. By highlighting high-quality comments, commissions can guide the public toward providing input that leads to more informed and representative redistricting decisions.

### **Build a Flexible and Responsive Codebook**

A well-structured, adaptable codebook is critical for effectively organizing and analyzing public comments. Teams should begin with a foundational framework that includes a basic set of categories relevant to redistricting such as Region, Communities of Interest, Process, which will guide the development of specific codes. Through an iterative process, teams should allow for regular reviews and updates to these categories and codes as new themes emerge from public comments. This ensures that the codebook remains relevant and supports analysis throughout the comment collection period.

The codebook should allow for multi-level coding, capturing both broad themes and specific details. “Primary codes” can be used for general categories (the code “100” might signify “COI”) while “subcodes” provide more granular information (subcode code “106” signifies “African American COI”). To maintain flexibility, use open-ended categories and “other” options. Clear definitions and real-world examples should accompany codes (in annotations, or in the margins) to ensure consistency across multiple coders.

### **Leverage Artificial Intelligence with Human Oversight**

Artificial intelligence (AI) tools, such as ChatGPT, can enhance the efficiency and consistency of the coding process when used judiciously. A uniform codebook serves as an excellent foundation for AI-assisted coding. By providing the AI with the codebook and feeding it comments one at a time, team members can quickly generate initial code assignments. This approach not only accelerates the coding process but also helps team members familiarize themselves with the codes, and maintain objectivity when reading comments.

However, AI should be viewed as a supportive tool rather than a replacement for human expertise. Public comments are often unique or complex, failing to fit neatly into predetermined categories. While maintaining a dynamic and expanding codebook can address this challenge, consistent human discernment is critical. Teams should implement a two-step process by which any analysis involving AI is subsequently checked over with a human review, to catch errors and misunderstandings.

### **Implement Transparent and Frequent Reporting**

Public comments should be analyzed and presented to the commission at multiple stages throughout the redistricting process, rather than just at the conclusion of public comment collection. Aides should segment the comments into phases and produce a memo for each phase. This approach allows for the analysis to evolve in response to the changing dynamics of redistricting. CLOSUP’s two memos exemplify how the focus of the redistricting discussion shifts over time, necessitating corresponding adjustments in the analysis. Depending on the specifics of a state’s process, additional memos may be necessary. Each memo should be presented to the commission to facilitate questions and discussion.

## Conclusion

As part of its ongoing effort to support Michigan communities, the MICRC should continue to refine and improve its public comment solicitation and analysis process. The most effective way to use public comments in a bottom-up redistricting approach is to use support staff to collect, categorize, and synthesize the key comment trends—the commissioners should not be expected to read through the thousands of comments alone. The MICRC can also ensure that these comments are high-quality, effective, and specific by requiring an additional form and comment examples as features of its online portal. For their part, the analysis team should be responsive to the needs of the MICRC and the actual trends that emerge from the comments. The analysis team should utilize appropriate data science management technology available to them, including AI, and be prepared to report on the data throughout the process.

A refined and effective public comment analysis is just one component of a successful redistricting process. To achieve the best outcomes, our recommendations should be paired with other practices rooted in research, particularly those that emphasize the importance of diversity and representation within commissions.

By implementing these improvements, future commissions can enhance their ability to serve their communities and ensure a more transparent, inclusive, and effective redistricting process. This approach will not only strengthen a commission's work but also foster greater public trust and engagement in the democratic process.

## Notes

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5. “Managing Mass, Computer-Generated, and Falsely Attributed Comments.” *Administrative Conference of the United States*, <https://www.acus.gov/research-projects/managing-mass-computer-generated-and-falsely-attributed-comments>. Accessed 20 Sept. 2024.
6. This section relies on Edward Plaut and Elizabeth Powers’s research on other state approaches to redistricting commissions. For more information on other state approaches to COIs and redistricting commissions in general, see Edward Webre Plaut & Elizabeth Powers, Note, *Crystalizing Community: Communities of Interest and the 2020 Michigan Independent Redistricting Commission*, 57 U. Mich. J.L. Reform 611 (2024).
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9. *In Re 2021 Redistricting Cases*, 528 p.3d 40, 88 (Alaska 2023), <https://www.casetext.com/case/in-re-2021-redistricting-cases>.
10. *Allen v. Milligan*, 599 U.S. 1, 30–33 (2023).
11. For example, Idaho’s Redistricting Commission is subject to the state’s Open Meetings Act, requiring its commission to attend open public meetings around the state. Idaho Code Ann. §§ 74–204–208; *2021 Commission for Reapportionment*, Idaho Legislature, <https://legislature.idaho.gov/redistricting/2021/> (last visited Feb. 23, 2024). See also N.Y. Const. art. III, § 4(c). *Some states have public comment portals akin to Michigan’s*. See Draw My Cal. Cmty., <https://drawmycalcommunity.org/> (last visited Jan. 22, 2024).
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