



Memo from Attorney Bob Bass re: Redistricting

From McCoy, DexterL <DexterLMcCoy@fortbendcountytexas.gov>

Date Tue 8/12/2025 12:29 PM

To Commissioner.McCoy <Commissioner.McCoy@fbctx.gov>; Smith-Lawson, Bridgette <Bridgette.Smith-Lawson@fortbendcountytexas.gov>; Turner, Michelle <Michelle.Turner@fortbendcountytexas.gov>

Cc Hasanali, Ali <Ali.Hasanali@fortbendcountytexas.gov>

2 attachments (33 MB)

Adopte 36x48.pdf; 20211105 - Executed Order Adopting Redistricting Plan - Final (FBC Redistricting 2021).pdf;

Good afternoon. Below is an email sent to me by Attorney Bob Bass of Allison, Bass & Magee hired by the county in to conduct the 2000, 2010, and 2020 redistricting efforts. At your convenience could you please forward to members of Commissioners Court for their review?

Thanks,
DLM

From: Bob Bass <r.bass@allison-bass.com>

Sent: Monday, August 11, 2025 9:57 AM

To: McCoy, DexterL <DexterLMcCoy@fortbendcountytexas.gov>

Subject: FW: Commissioner McCoy-If suitable, I want to send to all members of Comm. Ct.

My firm served as legal counsel for redistricting purposes in Fort Bend County in 1990-2020. We were retained for the 2020 redistricting effort pursuant to Article 45. 179, Texas Government Code. In each prior cycle the redistricting process involved the formation of a citizens committee, with attendant public comment and participation. In 2020, due to circumstances beyond our control, the 2020 Census was delayed and the time between release of the official data and deadlines under state law for the upcoming elections in 2022 were such that the formation and direct participation by the residents of the County were necessarily somewhat curtailed. However, every effort was made to comply with the Voting Rights Act, and each proposed plan was given careful review and assessment.

I have tried to relocate any specific e-mail traffic between myself and Fort Bend which might pertain to the redistricting plan adopted by the full Commissioners Court on or about November 5, 2021, without success. I am, however, attaching a copy of both a map, and the respective Order regarding this official action. I would urge the Court to carefully examine paragraph three of the Order. The Order reads in relevant part:

After convening in Public Hearing for comment upon any and all proposed plans, and after meeting in open session for the purpose of considering alternatives available to the County for modification of existing political boundaries **in a manner designed to achieve both acceptable levels of numerical balance between the four commissioners court precincts, and to protect the voting rights of all residents of Fort Bend County**, the Commissioners Court has determined to adopt the redistricting plan attached to this Order in map and data form, Exhibit 3, Proposal KP George 3.

I assume that the Order of November 5, 2021 was adopted in good faith by all voting members of the Court at that time. Any suggestion made more recently that the "final" plan, i.e. Proposal KP George 3, was adopted without proper scrutiny is contrary to my recall of the facts of this matter. The demographic analysis attached to that plan reflects population balance within appropriate guidelines, with sufficient attention to racial representation to most likely withstand any possible judicial scrutiny.

That being said, I am aware of the controversies in the fairly recent timeframe, and the uncertainties related to these matters. As a consequence, I am also aware of interest presently on the topic of mid-decade redistricting. I have cautioned against such efforts, primarily because of the unavailability of official census data at the census block level, which is necessary to properly redistrict. The Census is conducted every ten years, and this data is the only data that is given official recognition by the Courts. When that data is released, typically the year following the actual census count, it may already be in reality somewhat out of date due to population influx or departure during the intervening months since the official count in April of each even numbered tenth year. This problem, i.e. attempting to fairly accurately count a nationwide population growing rapidly beyond 340 million persons, is compounded each year following the 2020 census count.

Although the Census Bureau releases periodic "estimates" of county level population, these estimates are not broken down demographically to the census block. I am aware of counties elsewhere undertaking mid-decade redistricting, but typically, this has been accomplished under one or two circumstances. In one case, where for example, a large population influx can be rather specifically located to a geographic area, with a corresponding effort by the County to conduct what has been called a "windshield survey", which would require a determination of separate households, and application of the general "persons per household" utilized in the last census. This sort of effort is very difficult to initially prove up, is very costly, and is inherently subject to challenge on the basis of accuracy, integrity of the procedures used, and otherwise suspect as nothing more than a "best estimate" of population.

The other circumstance would occur when a civil lawsuit under the Voting Rights Act is filed, alleging a gross imbalance of population leading to a dilution of a qualified population of voters rights under that Act leads a Federal Court to order redistrict. This type of suit is most often filed soon after adoption of a plan by the governmental unit, when the most recent census data is still relatively fresh.

While I have been involved in several suits brought under the Voting Rights Act, in at least one of those cases which was filed several years into the decade, the Court determined that mid-decade was too late for judicial intervention, and that the plan adopted by the Commissioners Court, while not perhaps a thing of beauty was sufficiently in compliance with the Voting Rights act, and entered an Order to strictly abide by the provision of the Voting Rights Act in the next census, and to submit any proposed plan for Court scrutiny before adoption.

I do not perceive, at this time, any significant reason to undertake mid-decade redistricting. I hope these comments are helpful to you.

Robert T. "Bob" Bass

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IN THE COMMISSIONERS COURT OF
FORT BEND COUNTY, TEXAS

ORDER ADOPTING REDISTRICTING PLAN
FOR COMMISSIONERS COURT PRECINCTS

BE IT REMEMBERED, that on the 5 day of November 2021, came on to be considered the issue of periodic redistricting of county political boundaries. This Court has, in due time, given deliberate consideration to the legal issues and of governmental duties imposed by state and federal law. In addition, the Court has previously entered in the minutes of this Court, criteria by which any redistricting plan would be considered, the prior Order establishing criteria being incorporated herein by reference.

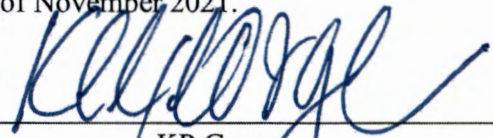
This Court has commissioned and has received an Initial Assessment by qualified professionals experienced in the field of redistricting law for the purpose of making a preliminary determination of population distribution between the four commissioners court precincts, and the obligation to comply with "one-person-one-vote" balance as required by applicable state and federal law. This assessment has been filed in the minutes of this Court, and is incorporated by this reference as Exhibit 1, Initial Assessment. A finding, based upon this assessment, recognized the legal duty to redraw political boundaries to comply with applicable law, and a copy of this finding is entered into the minutes of this court, by which reference this prior finding is incorporated into this Order of the Commissioners Court, Exhibit 2, Order Requiring Redistricting.

After convening in Public Hearing for comment upon any and all proposed plans, and after meeting in open session for the purpose of considering alternatives available to the County for modification of existing political boundaries in a manner designed to achieve both acceptable levels of numerical balance between the four commissioners court precincts, and to protect the voting rights of all residents of Fort Bend County, the Commissioners Court has determined to adopt the redistricting plan attached to this Order in map and data form, Exhibit 3, Proposal KP George 3. At a later date, this Court will receive a more complete description of this plan, including a map depiction of all new political boundaries, polling

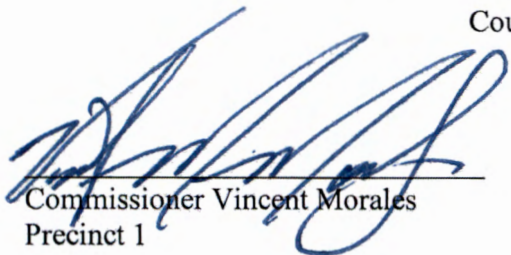
places, election precinct boundaries, and any affect such changes in Commissioners Court precincts may have upon Justice of the Peace/Constable precincts. This supplemental order will be taken up and considered by the Court after public notice as required by law.

IT IS THEREFORE ORDERED ADJUDGED AND DECREED that the Redistricting Plan depicted in the maps and data attached to this Order are hereby APPROVED and ADOPTED by the Commissioners Court of FORT BEND County, Texas. Upon final approval of the supplemental data to be provided at a later date, the Redistricting Plan, Proposal KP George 3 adopted by this Order shall be effective January 1, 2022 for use in the 2022 Primary and for all subsequent elections until changed or modified by later Order of this Court.

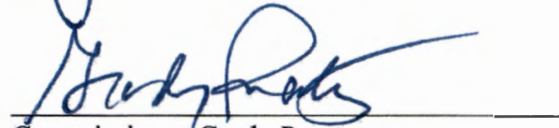
Signed this 23 day of November 2021.



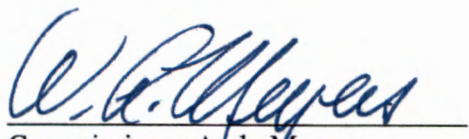
KP George
County Judge Fort Bend County



Commissioner Vincent Morales
Precinct 1



Commissioner Grady Prestage
Precinct 2



Commissioner Andy Meyers
Precinct 3



Commissioner Ken DeMerchant
Precinct 4

ATTEST:



County Clerk Laura Richard,
Ex Officio Clerk of the
Fort Bend County Commissioners Court



Exhibit

1

**INITIAL ASSESSMENT
OF
FORT BEND COUNTY, TEXAS
FOR PURPOSES OF REDISTRICTING EVALUATION**

Prepared by

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TAB A: Initial Assessment

The Initial Assessment is a narrative analysis of the data contained in the PL94-171 files provided by the Census Bureau, together with an explanation of the impact such data may have upon the County in light of state and federal law.

TAB B: Statistical Definitions and Determination of Total Maximum Deviation

Definitions of the various ratios, formula and procedures utilized in the analysis of county population. These ratios, formula and procedures have been largely developed in case law in the field of redistricting, together with generally recognized methods of sociological study.

NOTE: Prison inmate populations are included in the census data. However, inmates detained under felony convictions are not eligible to vote under Texas law. As such, populations of inmates held within the state prison system, either in state owned and operated facilities, or under contract in county facilities, are typically not counted in the determination of Total Maximum Deviation, or for other "one-person-one-vote" determinations. For purposes of the Initial Assessment, raw data has been acquired from the County and/or the Department of Criminal Justice regarding prison populations, and from the U.S. Immigration and Customs Enforcement (ICE) for persons held pending immigration cases. In subsequent census data releases, group housing data may reveal more specific information, but at this time, we are deducting prison populations from county population totals in order to arrive at a true "one-person-one-vote" analysis, and to avoid potential imbalances in population that might result of inclusion of prison population in precinct totals. County jails holding persons convicted of both felony and misdemeanor offenses, juvenile facilities, or facilities holding individuals pending resolution of pending criminal or immigration charges are included within the population counts for the county, as reflected in the census data.

DEMOGRAPHIC ANALYSIS

The working file is a demographic analysis of each major County elective office elected from geographic precincts. These files analyze the population demographics of each precinct based elective office, i.e. the offices of County Commissioner, and Justice of the Peace/Constable precincts. Prior to the 1990 census, previously existing election precinct boundaries were often described by non-physical boundaries. Since the use of computerized census maps was first implemented in 1990, based upon topological maps which contain not only physical boundaries, such as roads, streets, streams and water bodies, but also such "non-physical boundaries" as easements, municipal boundaries or other surveyed lines, but not visible on the ground, it was necessary to merely "approximate" those boundaries that were not defined by a physical boundary such as a road, watercourse, or other physical boundary. These approximations were described as Voter Tabulation Districts, or VTDs. It should be

noted that the VTD was only approximation of the actual voting boundaries, since Public Law 94-171 requires that the VTD utilize census blocks as its component parts.

In 1990, most counties adopted election boundaries based on census blocks, but VTDs are still encountered. The boundaries utilized in this Initial Assessment are derived from the Texas Legislative Council, and have been, to the extent possible, confirmed as accurate by local officials. However, some counties continue to have election precinct boundaries defined in a manner that is incompatible with census block-based mapping. Therefore, in some cases, you may find a discrepancy between the actual boundary in use, and the census block-based mapping boundaries used in this report. All future election precincts should be based upon census blocks to avoid any discrepancy between the actual boundary in use and the official boundary description maintained by the Texas Legislative Council.

County demographic data is depicted in chart and graphic form for both total county population as well as voting age population. While "One-Person-One-Vote" balance between the four Commissioners Court Precincts is based upon the entire county population, the availability of voting age populations is also important in two respects.

First, each county should assess the size of existing election precincts. State law limits the size of election precincts of not less than 100 registered voters, and not more than 5,000 registered voters per election precinct. (See §42.006, Texas Election Code, V.T.S.C.A), with some exceptions based on the size of each county population.

Second, in counties inhabited by a significant minority population, the need to create one or more Commissioners Court Precincts that assure minority representation requires utilization of voting age information. While the actual political boundaries will be based upon total population, the viability of the resulting precinct in terms of the ability to elect requires analysis of voting age population.

TAB C: Maps

The following maps depict county populations by census block. It should be noted that in some census blocks, the total population may be very small, and the resulting color shading may therefore result in some misperception of actual population totals.

Correlation of the map depiction with the data contained in the PL94-171 is necessary to assure accuracy of any assumptions or projections for reapportionment purposes. All computer-generated matters contained in this report, including statistical ratios or formulas, are derived from information taken directly from the Public Law 94-171 files of the United States Census Bureau. Allison, Bass & Magee, LLP shall not be responsible for errors that may occur in the PL94-171 data.

**Map 1: Depiction of Existing Commissioners
Court Precincts-County wide**

Map 2: Voting or Election Districts-County Wide

Map 2: Hispanic population

Map 3: Black population

Map 4: Other Non-Anglo Population
(Asian, American Indian, Pacific Islander, Other or
Multi-racial categories in excess of 3% aggregate.
Few Texas counties will have this level of "other"
Non-Anglo population. If your county does not have more than 3%
of "other non-Anglo population, there will be no Map 4)

Map 5: Justice/Constable Precincts

Map 5 depicts the Justice of the Peace/Constable Precincts, and the respective election precincts of each such Justice/Constable precinct. Reference should be made to Appendix B for demographic analysis of Justice/Constable precincts. It should be noted that the offices of Justice of the Peace and Constable are not considered as representative offices, and are therefore not legally required to comply with either "One-Person-One-Vote" balance or "representative" analysis under Section 2 of the Voting Rights Act. (42 U.S.C. 1973c) Counties are not required, therefore, to make any changes to existing justice or constable precincts by federal law. However, Article 5, Section 18 of the Texas Constitution sets population requirements for the number of justice precincts required. Each County should carefully examine the number of justice precincts required by law to determine if a reduction or expansion of existing justice/constable precincts is feasible. If changes are made to Justice/Constable precincts, either directly or as a result of modification of the election precincts that make up the Justice/Constable precinct, a voting rights analysis under the Voting Rights Act is required.

TAB A

**INITIAL ASSESSMENT
NARRATIVE**

**INITIAL ASSESSMENT
OF
FORT BEND COUNTY, TEXAS
POLITICAL BOUNDARIES
FOR
PURPOSES OF REDISTRICTING**

By

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GENERAL OVERVIEW

Following the Supreme Court decision in *Avery v. Midland County*, 390 U.S. 474; 88 S. Ct. 1114, 20 L. Ed. 2d 45 (1968), Texas Commissioners Courts have been required to make a periodic assessment of their political boundaries to determine whether the boundaries retain "one-person-one-vote" balance. This requirement is now carried forward by statutory requirement in Article 42.001 of the Texas Election Code.

Therefore, following each federal census, each Texas County should conduct an assessment of existing political boundaries. As a very general rule of thumb, any statistical change of population between the 2010 and 2020 census more than 3%, plus or minus, will indicate a potential need for reapportionment. Only in rare circumstances will a county experiencing a population change in excess of 3% avoid the need for rather extensive reapportionment of the county Commissioners Court precinct lines. However, any assumption that a population change of less than 3% will not require reapportionment is ill advised. Populations will shift within a county over time. Every County, even those with a rather insignificant overall population change, should carefully examine actual population demographics relative to their existing political lines to determine the need for reapportionment.

It should be carefully noted that simple comparisons between the county population of 2010 and 2020, or even a more sophisticated analysis of urban and rural areas of the county might not reflect the true extent of population "change" each County has experienced over the last ten years. "Change" may not directly correlate to "different" or "new" population. For example, existing populations within a county move considerably within a ten-year span. The movement of a single family a rural area to an urban area within the same county will impact both categories, and where that move crosses political boundaries, may have a significant impact on the obligation of that County to redistrict.

Efforts to balance road mileage, or to achieve other entirely practical adjustments of county boundaries must be undertaken with great care to avoid unintended shifts of population which will either exceed the required numerical balance, or will offend the Voting Rights Act.

With this general overview, the following sections of this Initial Assessment will evaluate each layer of Fort Bend County's political boundaries and attempt to determine whether or not the Commissioners Court should undertake reapportionment. Our assessment will point out areas of potential conflict with state and federal law, and will also suggest areas that may be considered for purposes of cost effectiveness and voter/resident convenience.

INITIAL SUMMARY FINDINGS REGARDING NUMERICAL BALANCE:

Please review the information contained under Tab B carefully. Please pay particular attention to the following:

1. Please consider the Total Maximum Deviation in terms of population between the Actual Population of each Commissioners Court Precinct and the Ideal Population. Remember that the ideal population of each precinct is exactly one-quarter of the total county population.
2. Next, consider the Relative Deviation, expressed as a percentage, of the Actual Population of each precinct as compared to the Ideal Population of each precinct.
3. Redistricting will be necessary to comply with 'One-Person-One-Vote' standards if the Total Maximum Deviation between the largest precinct and the smallest precinct (in terms of population) exceeds 10%.
4. Therefore, carefully examine the Total Maximum Deviation calculation. If that number is more than 10%, Fort Bend County is legally obligated to make changes in its political boundaries to re-balance the population to more equal terms.
5. If the Total Maximum Deviation exceeds approximately 7%, you may want to consider redistricting in order to re-balance your boundaries, although you are not legally required to do so at this time.
6. Fort Bend County has a total population of 822,799 individuals, so the ideal precinct size would be 205,695, i.e. divide the total population by four (4), the number of single member districts, i.e. Commissioner's Court Precincts. You then determine the deviation from this ideal precinct. Precinct 3 is the most overpopulated precinct, with 50,728 over the ideal, or 24.66%. Precinct 2 is the least populated precinct, -29,966 below the ideal, or 14.57%. Adding the two percentages together, disregarding the plus or minus sign, and you have a Total Maximum Deviation of 39.23%, well in excess of the maximum allowable deviation of no more than 10%.
7. Redistricting will be required based on total population.
8. If prisons holding felons are excluded, on the basis that felons cannot vote, and therefore should not be included in the voting-based realignment of precinct boundaries, the Total Maximum Deviation remains well in excess of the 10% maximum, at 39.32%. Prison population is 1,847 persons. County jail population is included with the remaining population because many of these individuals remain eligible to vote.

MINORITY VOTING RIGHTS

As a general rule, where the total minority percentage exceeds 25% of the total population, there is ample justification to create a commissioner's precinct that contains a potential voting majority of minority residents. In concentrations greater than 40%, consideration should be given to creating at least one commissioner's precinct with a potential voting majority of minority residents, with the possibility of any "excess population" being used to impact one or more other precincts. Where the total minority concentration exceeds 40%, the issue of "Packing" becomes a consideration, meaning that minority populations cannot be "packed" into a single precinct, but must be allowed to influence as many precincts as the total minority population warrants without efforts to fragment otherwise contiguous concentrations of minority population.

Please examine the demographic data contained under Tab B very carefully.

With the racial profile outlined under Tab B, minority representation must not be diluted, and where possible, a voting majority of minority residents should be created. In order to achieve the maximum minority representation within the demographic and geographic limitations in existence, it will be necessary to determine which election precincts, and which census blocks, contain the highest percentage of minority population and to take such reasonable measures as will insure the highest possible minority voice in county government. To achieve this goal, some attention must be paid to voting age minority residents. Again, please review the data contained under Tab B. In order to create a viable voting majority of ethnic, race or language minority voters, it is necessary to attain a voting age population within at least one Commissioners Court precinct of approximately 55% or better. In order to accomplish this high number of voting age population, a total population figure in excess of 60% is typically required.

Please examine Tab B to determine the minority population of each of the four Commissioners Court precincts. A determination of whether or not the minority populations in these precincts could be joined in a single precinct, or perhaps concentrated in an effort to maximize minority impact upon elections is difficult to assess without a more detailed evaluation of historical voting patterns, racial demographics, and the realities of political boundaries.

When taken with the numerical imbalances that must be addressed, it would appear that, if at all possible, minority populations might be concentrated in at least one Commissioners Court precinct to the degree possible to achieve an acceptable potential minority concentration. Typically, the Commissioners Precinct with the largest minority concentration prior to redrawing lines is the best candidate for any alternative plan, but other possible constructions of precinct lines might well result in a favorable racial profile.

Fragmenting minority population concentrations must be avoided. Any modification of political boundaries to accomplish compliance with the requirements of the Voting Rights Act must be carefully considered.

ASSESSMENT OF JUSTICE OF PEACE AND CONSTABLE PRECINCTS

Please see Map 5 for a description of existing Justice of the Peace and Constable Precincts in Fort Bend County.

Article 5, Section 18 of the Texas Constitutional provides that each county of the State having a population of 50,000 or more shall be divided into not less than four and not more than eight precincts. Counties having a population of less than 18,000 shall be composed of a single justice/constable precinct, unless the Commissioners Court determines that not more than four such justice/constable precincts are needed. Counties having a population of less than 150,000, but which contain a city having a population of 18,000 or more inhabitants, shall provide for not less than two justices of the peace to service the city(s) having 18,000 or more inhabitants.

In each precinct so created, there shall be elected a Justice of the Peace and a Constable, each of whom shall hold office for four years.

Within the context of these Constitutional provisions, it is recommended that Fort Bend County reconsider the actual need for justice/constable precincts, and consider whether that need suggests change in the present configuration of justice/constable precincts. Article 292.001 Local Government Code and Article 27.051, Government Code address the location of Justice of the Peace courts. In counties having a population of less than 50,000, the County Commissioners Court may locate the justice courts either in the precinct served that justice court, or may centralize the courts in the County courthouse. In counties having a population greater than 50,000, the justice courts must be physically located in the precinct they serve.

It is important to note that Justice of the Peace Precincts do not need to be numerically balanced, since Justice Court do not make law, but interpret the law. Only the legislative, or executive bodies, such as the Commissioners Court, are required to be numerically balanced.

However, Justice Precincts must be drawn with the Voting Rights Act requirements in mind.

ASSESSMENT OF ELECTION PRECINCTS

Election Precincts are the building blocks for all other political boundaries. Therefore, our assessment begins with this primary political unit. According to Article 42.006, Texas Election Code, V.A.C.S., each election precinct must contain not fewer than 50 registered voters and not more than 5000 registered voters. (Exceptions apply depending upon county population). For the Initial Assessment, no attempt has been made to acquire actual registered voter information. In this preliminary assessment, a formulistic approach will be used. For purposes of the Initial Assessment, we make some assumptions that allow us to estimate the highest probable number of registered voters that might reside within an election precinct. Using the voting age population demographic information contained in Appendix B, we assume that the percentage of actual registered voters would never exceed 70% of the total "eligible" voters over the age of 18 years. This assumption will generally hold true, but in some isolated cases, the actual number of registered voters may exceed 70% of total eligible voters.

Reducing the number of election precincts, where appropriate, lowers the overall costs of elections, but this reduction must be coupled with other factors, such as automated vote counting, in order to ensure that election returns can be quickly and accurately tabulated in the resulting larger election precincts. With automated vote counting systems, smaller polling place staff can accommodate larger numbers of voters, and achieve overall reductions in the costs of elections.

Current election precincts are generally acceptable. However, as the boundaries of the Commissioners Court precincts are altered to accommodate "one-person-one-vote" and Voting Rights Act changes, there will be incidental modification to your existing election precincts in most areas. In addition, you may wish to make other changes in existing election precincts to accommodate state law requirements regarding the number of voters permitted in election precinct, or to address other issues of local concern. As the process continues, we will discuss these issues with you for your guidance.

CONSOLIDATION FACTORS

A limiting factor in wholesale consolidation of county election precincts will be the restraints imposed by Art. 42.005, Texas Election Code, V.A.C.S., which restricts county election precincts to that territory which does not contain more than one commissioner's precinct, justice precinct, congressional district, state representative district, state senatorial district, or a State Board of Education District. It is also recommended that residents of a

municipality be in separate election precincts from rural voters, for purposes of conducting city elections.

In any plan for county election precincts within a city having single member election districts, city ward lines must be followed to prevent a violation of state law. Therefore, all cities within the county should be encouraged to participate and cooperate in the reapportionment process.

Although state law does not require the county election precincts to conform to independent school district election precincts, if Fort Bend County serves as the election's administrator for other jurisdiction's elections, it only makes prudent sense to consult with each political entity to make sure your county election precincts are compatible with city or school single-member districts.

GENERAL HOUSEKEEPING

Some attention should be given to "straightening" political boundaries into more uniform shape. In some cases, certain election precincts may be altered to use a more commonly understood or recognized physical boundary in lieu of a poorly identified or recognized boundary. Public Law 94-171, which directed the Census Bureau to develop a uniform mapping and demographic profiling approach for use by small personal computers, required that all voter tabulation districts (VTDs) follow census block boundaries. In many cases, county voting districts had been previously drawn in a manner that did not follow a census block boundary. This required the State of Texas, acting in conjunction with the State Data Center and the Texas Legislative Council, to move the actual voting district boundary to coincide with a nearby census block boundary for tabulation purposes only. The resulting VTD was no longer "actual," but an approximation referred to as a "pseudo-voting district."

Every reasonable effort has been made to conform the pseudo voting district to actual VTD boundaries. However, due to the nature of the available data base, and the requirements of Public Law 94-171, there may be occasions in which the pseudo voting districts, or the resulting lines between commissioner's court precincts, are different from those that actually exist. Again, the use of the pseudo voting district was for tabulation purposes only, and any apparent difference between actual and apparent political lines should be considered as minimal. However, since all later census counts were undertaken upon the census blocks, there could be a valid argument that a necessity to alter current election district boundaries to match the census block format exists. Under these circumstances, new political lines will be required to avoid conflict with census block lines that do not match current political area definitions. While matching census blocks to actual political lines would not, in and of itself, generally support a decision to reapportion under the circumstances that exist in Fort Bend County, there is a justifiable combination of factors that would support a reapportionment decision. These factors would include:

1. Redrawing election precincts to increase voter convenience.
2. Consolidation of election precincts where practicable.

3. Resizing election precincts to achieve greater efficiency.

4. Harmonizing actual political lines with pseudo voting districts based upon census blocks.
5. Redrawing all lines to achieve "one-person-one-vote" deviations of the smallest possible percentage.

CONCLUSION

While the primary task of reapportionment will concentrate on the issue of numerical balance and minority representation in the formation of commissioners' court precincts, other valuable improvements could also be achieved in the political well-being of Fort Bend County by redrawing existing lines. The method and manner by which these less direct goals are accomplished is a responsibility imposed upon the Commissioners Court beyond those expressly required by the Voting Rights Act or the Constitution, but which may have just as much value to the general public. Cost efficiency and voter convenience in elections that might be achieved by a serious evaluation of election precincts, and the elimination of unnecessary confusion by cooperation with other governmental entities are only two of the benefits that might be achieved by reapportionment beyond the legal duties required by law.

Another issue that should be considered is the actual need for Justice of the Peace/Constable Precincts. While local demand for Justice/Constable services may well justify the current number of justice courts, the cost of maintenance and administration of these particular governmental offices should be carefully evaluated. However, state law may limit a county's ability to reduce the number of Justice/Constable precincts.

Finally, the county should consider a wholesale renumbering of its election precincts in order to simplify future elections. Consolidation should be considered where possible, subject to limitations imposed by state law and were possible by agreement with any Independent School Districts in the County.

Redistricting should be viewed as an opportunity for streamlining county organization, and a chance to address as many issues as possible to achieve greater participation and involvement in county government. This is the time to plan for future growth, anticipate costs of government operations, and to involve the public in the process of county government. We look forward to working with you in this exacting but rewarding process.

ALLISON, BASS & MAGEE, L.L.P.

TAB B

DETERMINATION OF TOTAL MAXIMUM DEVIATION And POPULATION DEMOGRAPHICS BY PRECINCT

COMMISSIONER'S COURT PRECINCTS

	Actual Pop.	Ideal Pop.	Deviate	Relative Deviation
Precinct 1	192019	205695	-13676	-6.65%
Precinct 2	175729	205695	-29966	-14.57%
Precinct 3	256423	205695	50728	24.66%
Precinct 4	198608	205695	-7087	-3.45%
Total	822779	822779		
Total Maximum De	39.23	%		

Total Maximum Deviation above 10%
requires redistricting

Maximum Deviation less than than 5% is
desireable if possible.

Ethnic/Racial Data-Total

	Anglo	Black	Am. Ind.	Asian	Hispanic	Haw/Pac Is	Other	Multi	Totals	%
Precinct 1	60286	39529	354	16026	69413	72	884	5455	192019	23.34%
Precinct 2	20570	69767	226	29571	50721	65	795	4014	175729	21.36%
Precinct 3	105920	32673	418	52816	53562	82	1351	9601	256423	31.17%
Precinct 4	56950	25995	271	83109	24884	57	1025	6317	198608	24.14%
Total	243726	167964	1269	181522	198580	276	4055	25387	822779	100.00%
% of County	29.62%	20.41%	0.15%	22.06%	24.14%	0.03%	0.49%	3.09%	100.000%	

Ethnic %

Precinct 1	31.40%	20.59%	0.18%	8.35%	36.15%	0.04%	0.46%	2.84%	100.00%
Precinct 2	11.71%	39.70%	0.13%	16.83%	28.86%	0.04%	0.45%	2.28%	100.00%
Precinct 3	41.31%	12.74%	0.16%	20.60%	20.89%	0.03%	0.53%	3.74%	100.00%
Precinct 4	28.67%	13.09%	0.14%	41.85%	12.53%	0.03%	0.52%	3.18%	100.00%

Voting Age Ethnic/Racial Data

	Anglo	Black	Am. Ind.	Asian	Hispanic	Haw/Pac Is	Other	Multi	Totals	%
Precinct 1	47360	28433	295	12567	47085	54	582	3135	139511	23.37%
Precinct 2	16883	52347	132	23383	35456	47	542	2493	131283	21.99%
Precinct 3	77056	21794	296	36635	35527	66	791	5188	177353	29.71%
Precinct 4	45979	19051	170	61992	17492	42	650	3470	148846	24.93%
Total	187278	121625	893	134577	135560	209	2565	14286	596993	100%
% of County	31.37%	20.37%	0.15%	22.54%	22.71%	0.04%	0.43%	2.39%	100%	

Voting Age %

Precinct 1	33.95%	20.38%	0.21%	9.01%	33.75%	0.04%	0.42%	2.25%	100.00%
Precinct 2	12.86%	39.87%	0.10%	17.81%	27.01%	0.04%	0.41%	1.90%	100.00%
Precinct 3	43.45%	12.29%	0.17%	20.66%	20.03%	0.04%	0.45%	2.93%	100.00%
Precinct 4	30.89%	12.80%	0.11%	41.65%	11.75%	0.03%	0.44%	2.33%	100.00%

Initial Analysis
Fort Bend County, Texas

	Actual Pop.	Ideal Pop.	Deviate	Relative Deviation
Precinct 1	192019	205238	-13219	-6.44%
Precinct 2	175729	205238	-29509	-14.38%
Precinct 3	256423	205238	51185	24.94%
Precinct 4	196781	205238	-8457	-4.12%
Total	820952	820952		
Total Maximum Deviation	39.32%			

Total Maximum Deviation above 10% requires redistricting

Maximum Deviation less than than 5% is desirable if possible.

Ethnic/Racial Data-Total

	Anglo	Black	Am. Ind.	Asian	Hispanic	Haw/Pac Is	Other	Multi	Totals	%
Precinct 1	60286	39529	354	16026	69413	72	884	5455	192019	23.39%
Precinct 2	20570	69767	226	29571	50721	65	795	4014	175729	21.41%
Precinct 3	105920	32673	418	52816	53562	82	1351	9601	256423	31.23%
Precinct 4	56227	25389	271	83106	24392	57	1021	6311	196774	23.97%
Total	243003	9004	1269	181519	198088	276	4051	25381	820945	100.00%
% of County	29.60%	1.10%	0.15%	22.11%	24.13%	0.03%	0.49%	3.09%	100.00%	

Ethnic %

Precinct 1	31.40%	20.59%	0.18%	8.35%	36.15%	0.04%	0.46%	2.84%	100.00%
Precinct 2	43.67%	39.70%	0.13%	16.83%	28.86%	0.04%	0.45%	2.28%	131.96%
Precinct 3	41.31%	12.74%	0.16%	20.60%	20.89%	0.03%	0.53%	3.74%	100.00%
Precinct 4	28.57%	12.90%	0.14%	42.23%	12.40%	0.03%	0.52%	3.21%	100.00%

Voting Age Ethnic/Racial Data

	Anglo	Black	Am. Ind.	Asian	Hispanic	Haw/Pac Is	Other	Multi	Totals	%
Precinct 1	47360	28433	295	12567	47085	54	582	3135	139511	23.44%
Precinct 2	16883	52347	132	23383	35456	47	542	2493	131283	22.06%
Precinct 3	77056	21794	296	36635	35527	66	791	5188	177353	29.80%
Precinct 4	45257	18447	170	61989	17001	42	649	3470	147025	24.70%
Total	186556	121021	893	134574	135069	209	2564	14286	595172	100%
% of County	31.34%	20.33%	0.15%	22.61%	22.69%	0.04%	0.43%	2.40%	100%	

Voting Age %

Precinct 1	33.95%	20.38%	0.21%	9.01%	33.75%	0.04%	0.42%	2.25%	100.00%
Precinct 2	12.86%	39.87%	0.10%	17.81%	27.01%	0.04%	0.41%	1.90%	100.00%
Precinct 3	43.45%	12.29%	0.17%	20.66%	20.03%	0.04%	0.45%	2.93%	100.00%
Precinct 4	30.78%	12.55%	0.12%	42.16%	11.56%	0.03%	0.44%	2.36%	100.00%

JUSTICE OF THE PEACE/CONSTABLE PRECINCTS

	Actual Pop.	Ideal Pop.	Deviate	Relative Deviation
Precinct 1	192019	205695	-13676	-6.65%
Precinct 2	175729	205695	-29966	-14.57%
Precinct 3	256423	205695	50728	24.66%
Precinct 4	198608	205695	-7087	-3.45%
Total	822779	822779		
Total Maximum Dev	39.23	%		

Total Maximum Deviation above 10%
requires redistricting

Maximum Deviation less than than 5% is
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Ethnic/Racial Data-Total

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% of County	29.62%	20.41%	0.15%	22.06%	24.14%	0.03%	0.49%	3.09%	100.000%	

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Total	187278	121625	893	134577	135560	209	2565	14286	596993	100%
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Voting Age Ethnic/Racial Data

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Total	186556	121021	893	134574	135069	209	2564	14286	595172	100%
% of County	31.34%	20.33%	0.15%	22.61%	22.69%	0.04%	0.43%	2.40%	100%	

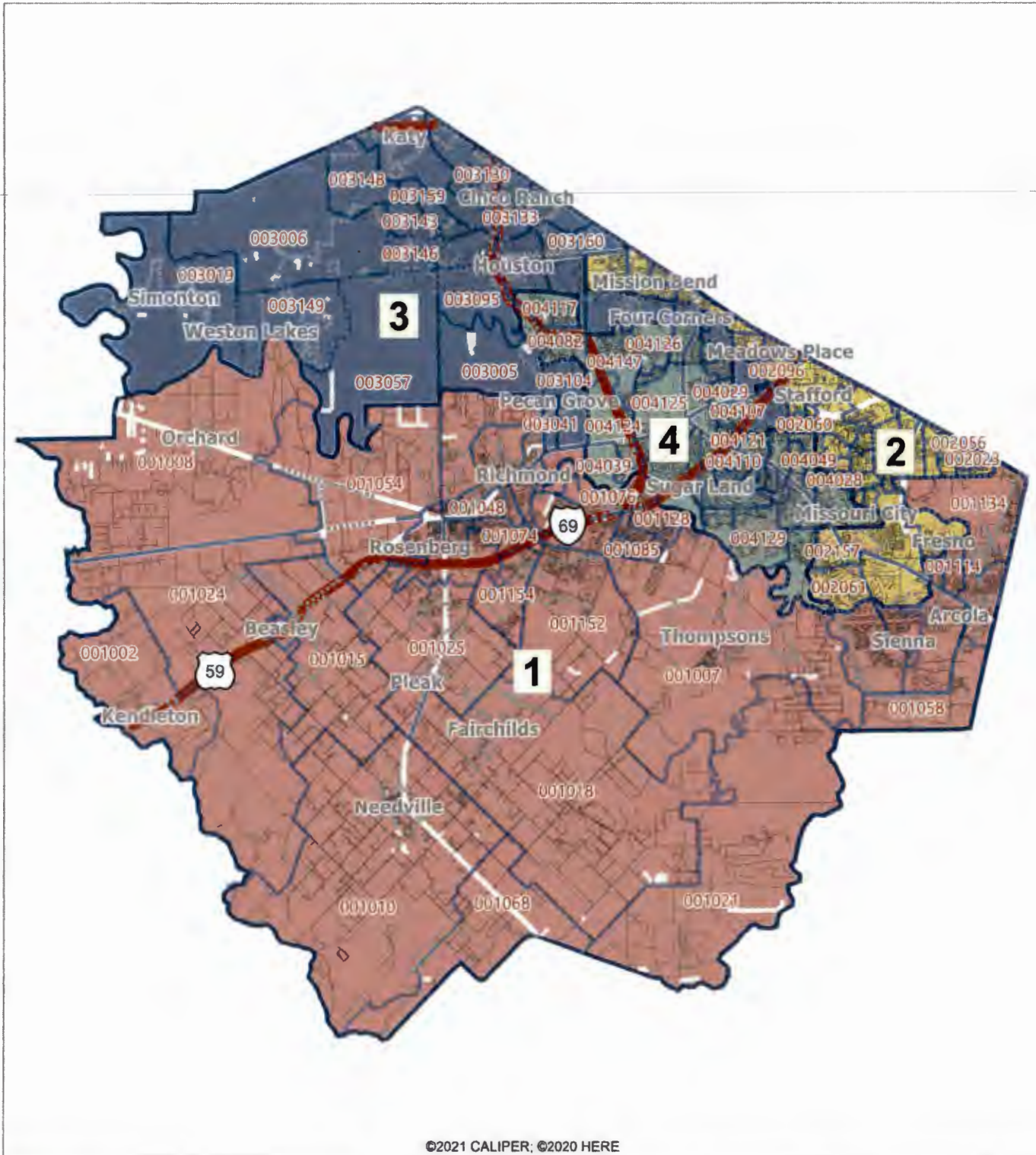
Voting Age %

Precinct 1	33.95%	20.38%	0.21%	9.01%	33.75%	0.04%	0.42%	2.25%	100.00%
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Precinct 4	30.78%	12.55%	0.12%	42.16%	11.56%	0.03%	0.44%	2.36%	100.00%





TAB C

FORT BEND COUNTY EXISTING POLITICAL BOUNDARIES IN MAP FORM

MAP 1
DEPICTION OF EXISTING
COMMISSIONERS COURT
PRECINCTS
And
VOTING/ELECTION PRECINCTS




©2021 CALIPER; ©2020 HERE

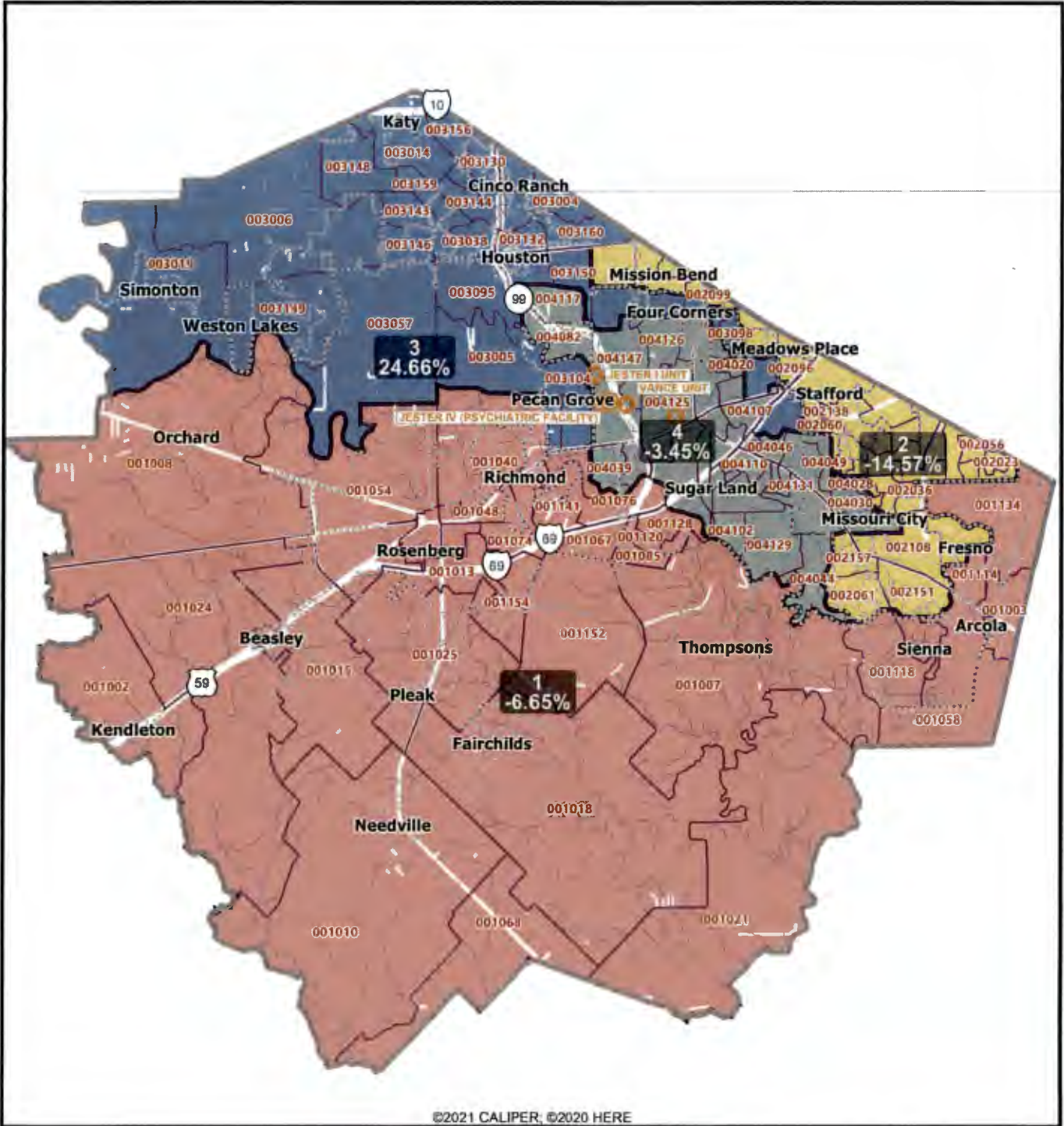
	Commissioner Precinct 1
	Commissioner Precinct 2
	Commissioner Precinct 3
	Commissioner Precinct 4

Fort Bend County

Initial Assessment Commissioner Precincts



Allison, Bass & Magee, LLP
 Date:
 Data Source: 2020 Census



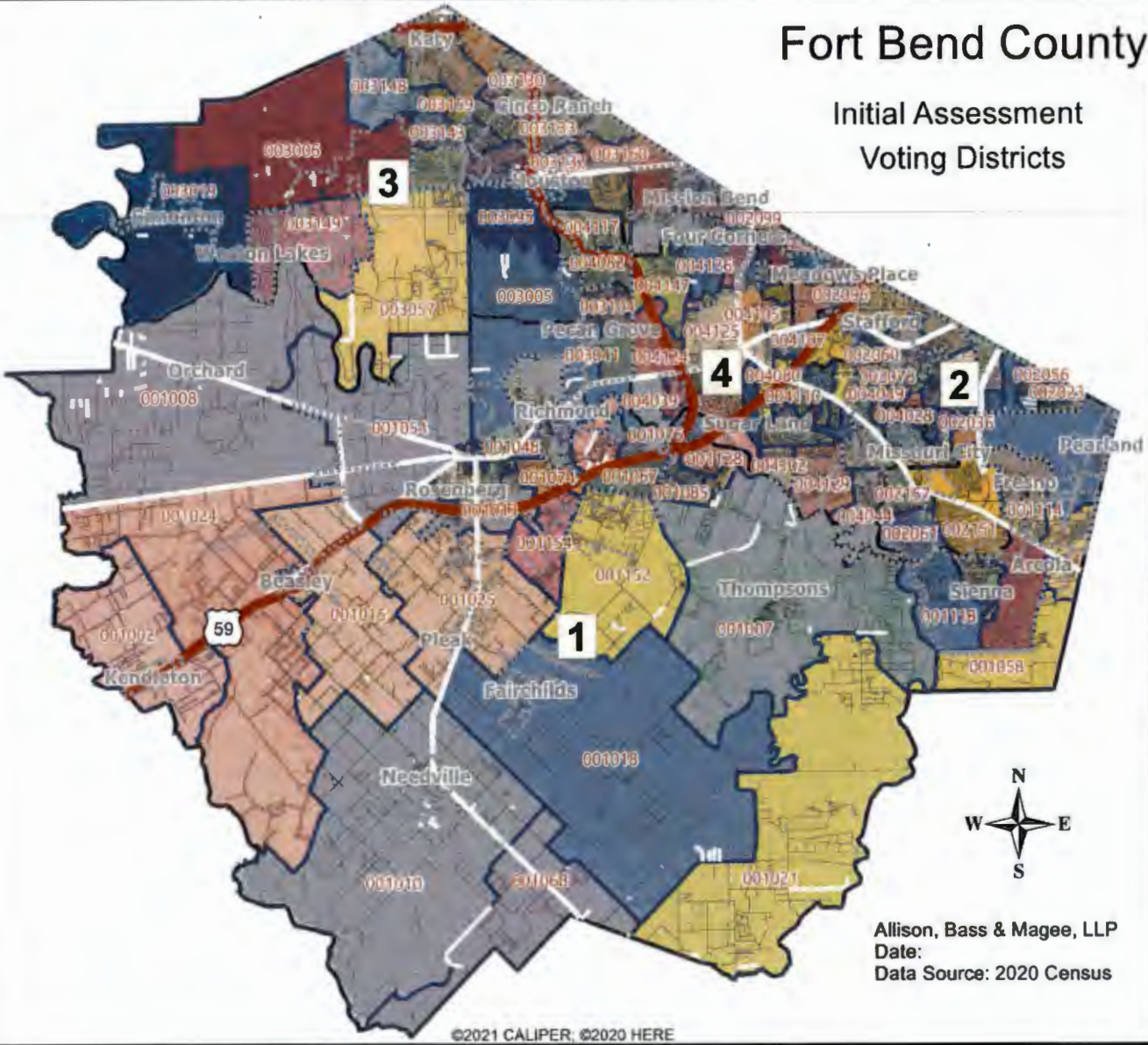
District	
	Commissioner Precinct 1
	Commissioner Precinct 2
	Commissioner Precinct 3
	Commissioner Precinct 4

Fort Bend County
 Initial Assessment
 Commissioner Precincts
 With Prison Pop.

Allisson, Bass & Magee, LLP
 Date: 8/24/2021
 Data Source: Census 2020

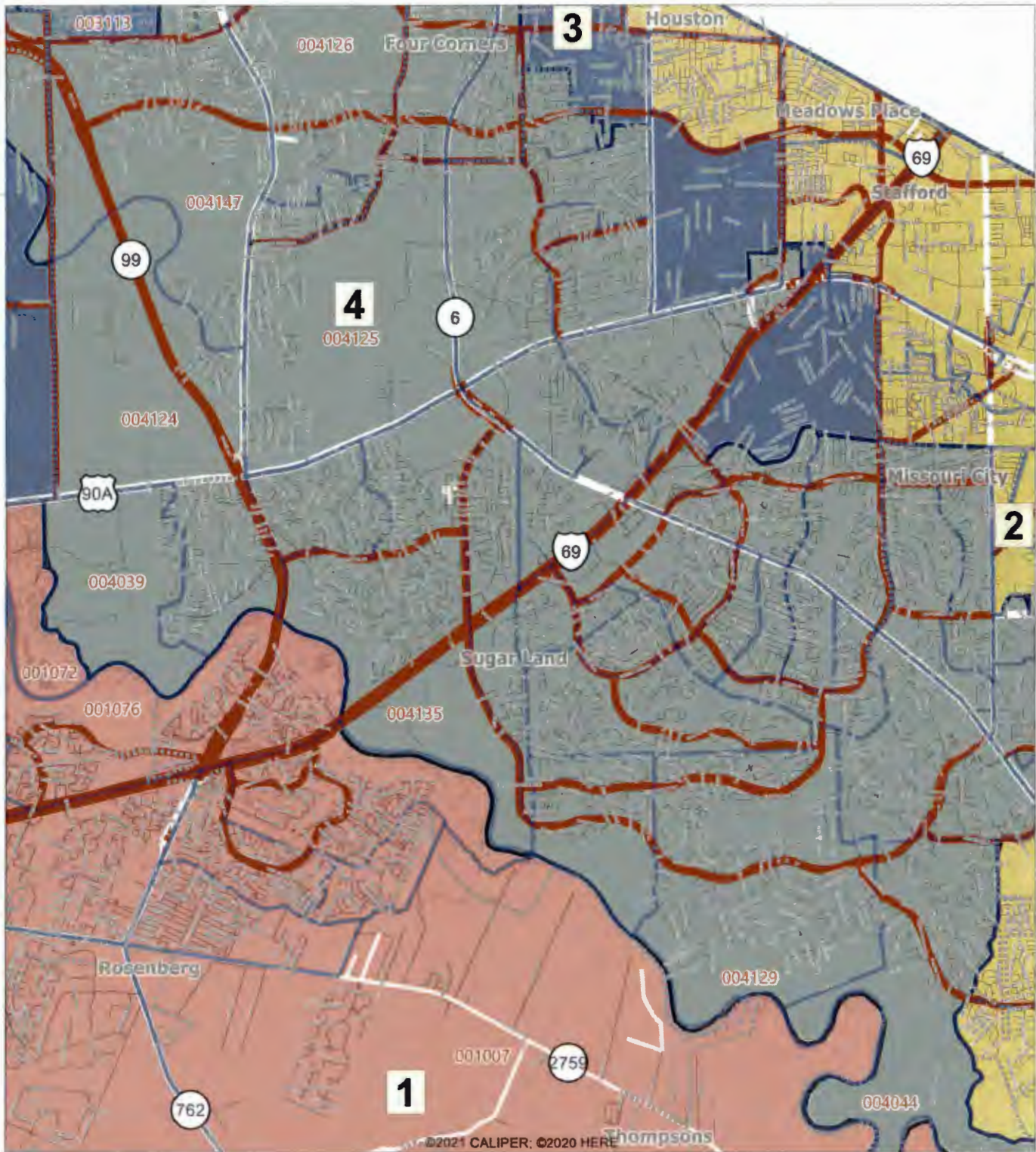
Fort Bend County

Initial Assessment Voting Districts




Voting District

001001	001067	001152	002060	002106	003032	003144	004042	004107
001002	001068	001153	002061	002108	003038	003145	004044	004110
001003	001072	001154	002066	002112	003041	003146	004045	004111
001007	001073	002016	002070	002115	003053	003148	004046	004117
001008	001074	002017	002075	002116	003057	003149	004047	004119
001010	001076	002022	002077	002123	003063	003150	004049	004121
001012	001085	002023	002078	002136	003069	003156	004062	004124
001013	001087	002031	002081	002137	003083	003159	004064	004125
001015	001094	002033	002088	002138	003095	003160	004065	004126
001018	001097	002034	002089	002139	003098	004011	004071	004127
001021	001103	002036	002090	002151	003104	004020	004079	004129
001024	001109	002043	002091	002157	003113	004026	004080	004131
001025	001114	002050	002092	003004	003122	004027	004082	004135
001037	001118	002051	002093	003005	003130	004028	004084	004140
001040	001120	002052	002096	003006	003132	004029	004086	004147
001048	001128	002055	002099	003009	003133	004030	004102	004155
001054	001134	002056	002100	003014	003142	004035	004105	004158
001058	001141	002059	002101	003019	003143	004039		



- Commissioner Precinct 1
- Commissioner Precinct 2
- Commissioner Precinct 3
- Commissioner Precinct 4

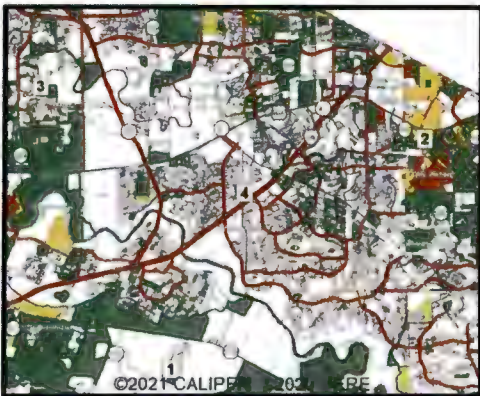
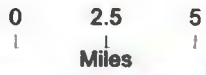
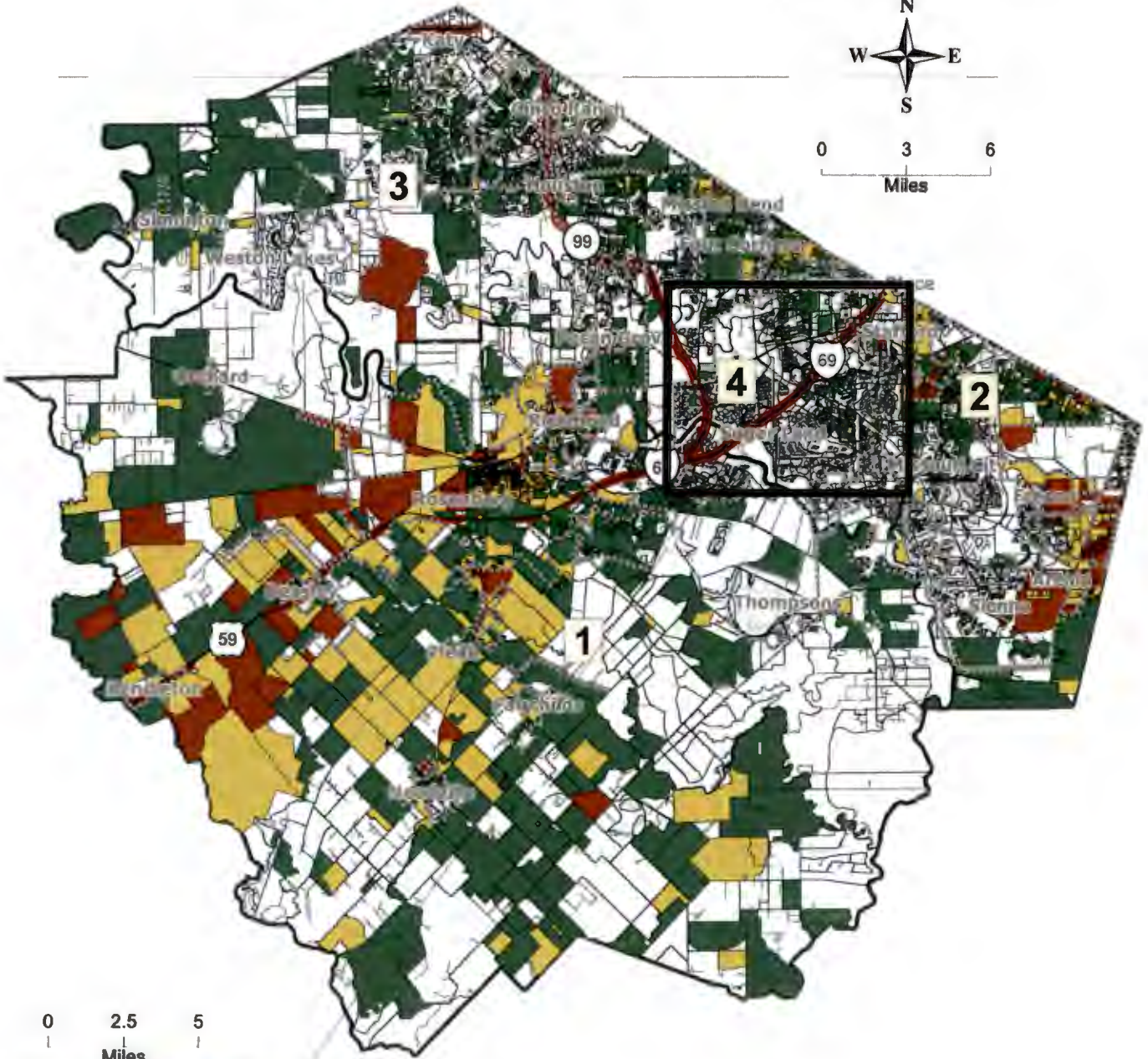
Fort Bend County
City of Sugarland
Initial Assessment
Commissioner Precincts



Allison, Bass & Magee, LLP
 Date:
 Data Source: 2020 Census

MAP 2 HISPANIC POPULATION

Fort Bend County Hispanic Population



Percentage of Hispanic Population per Census Block

- 50.00% and below
- 50.00% to 80.00%
- 80.00% and above

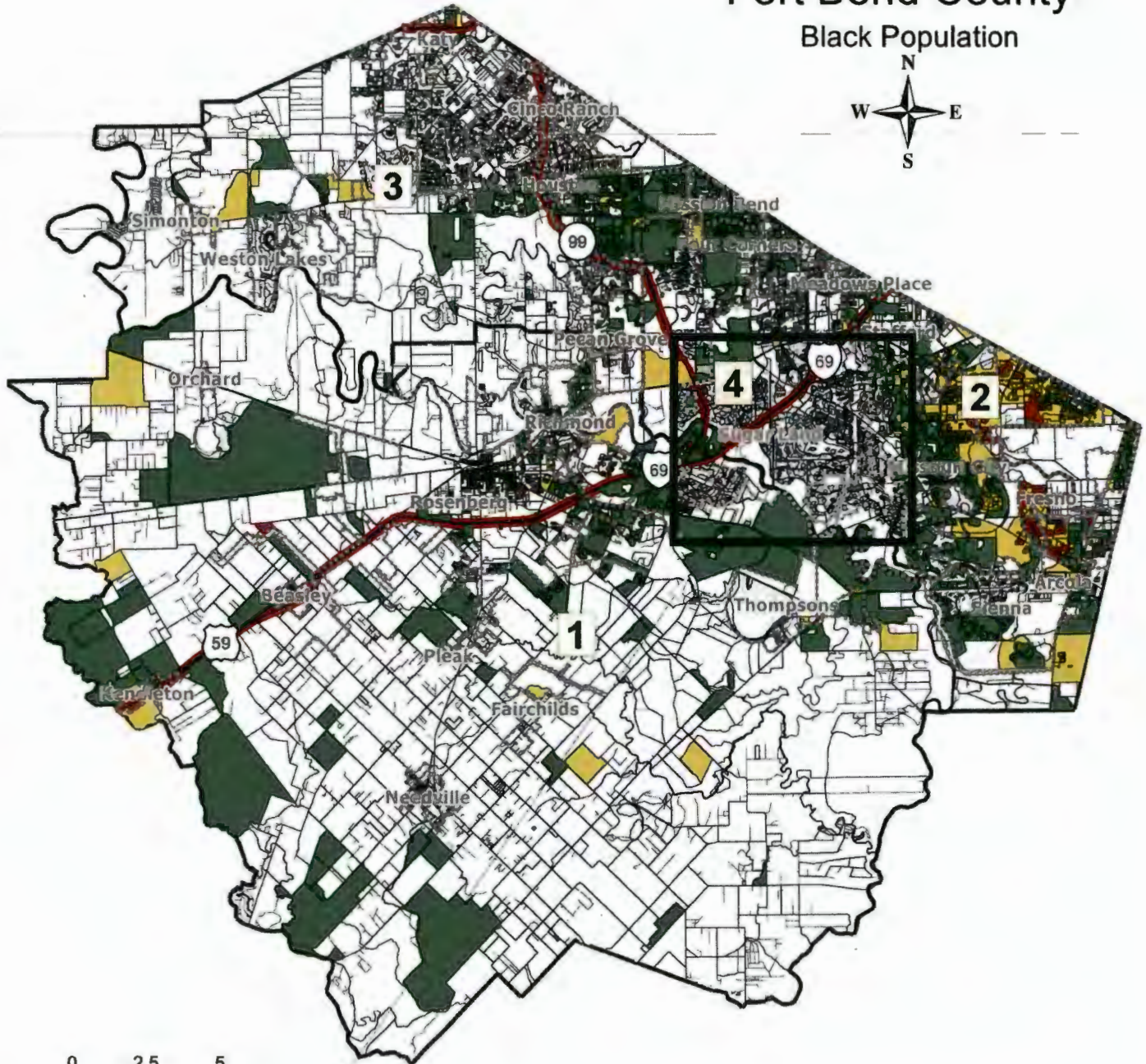
1 Commissioner Precinct

Allison, Bass & Magee LLP
Date: 9/14/2021
Data Source: Census 2020

MAP 3 BLACK POPULATION

Fort Bend County

Black Population



0 2.5 5
Miles



Percentage of Black Population per Census Block

- 50.00% and below
- 50.00% to 80.00%
- 80.00% and above

1 Commissioner Precinct

Allison Bass & Magee LLP
Date 9/14/2021
Data Source Census 2020

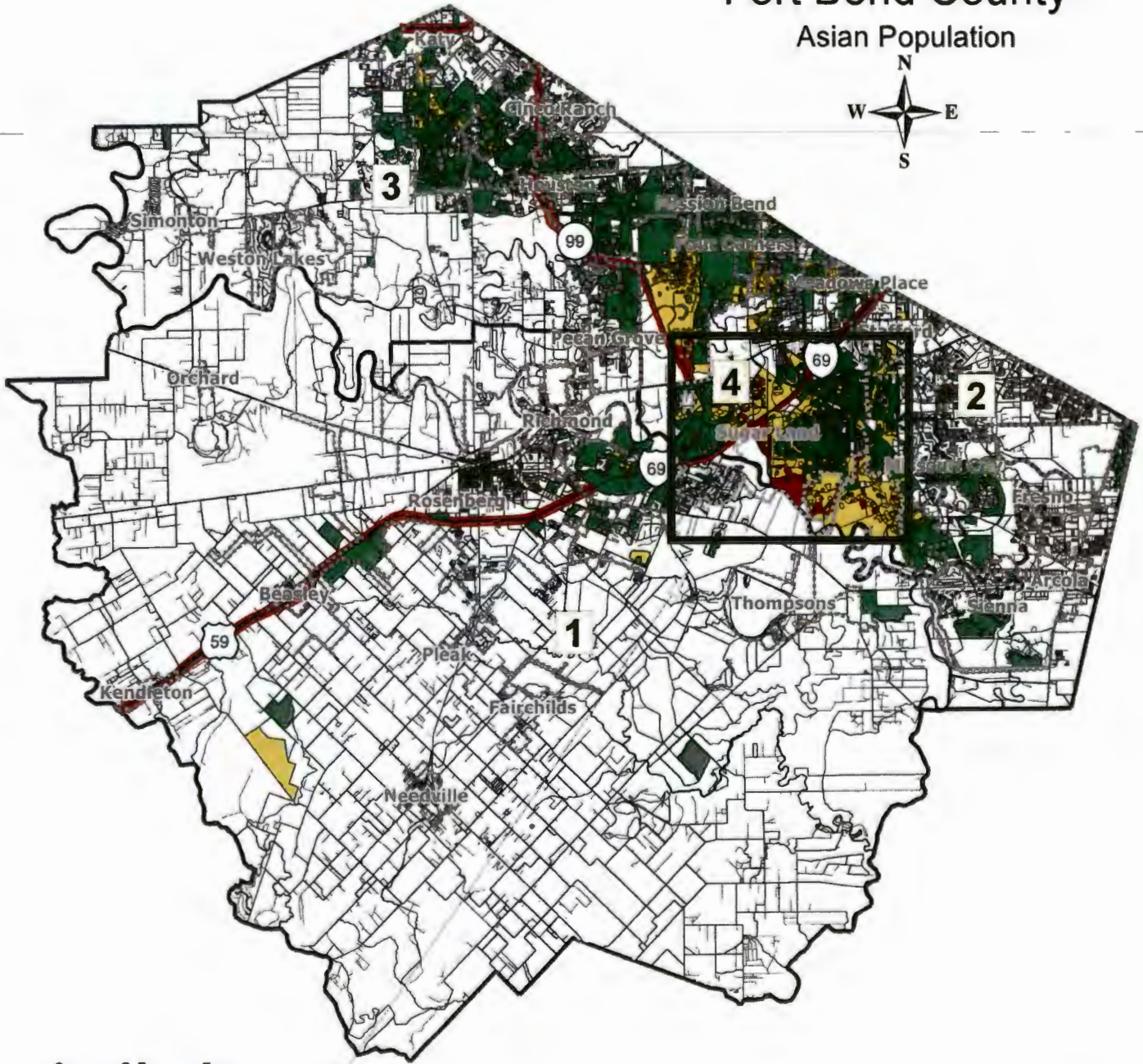
MAP 4

OTHER MINORITY POPULATION

NOTE: If "Other" minority populations within Fort Bend County do not equal or exceed five percent (5%), this portion of the population will not be depicted in map form.

Fort Bend County

Asian Population



0 2.5 5
Miles



Percentage of Asian Population per Census Block

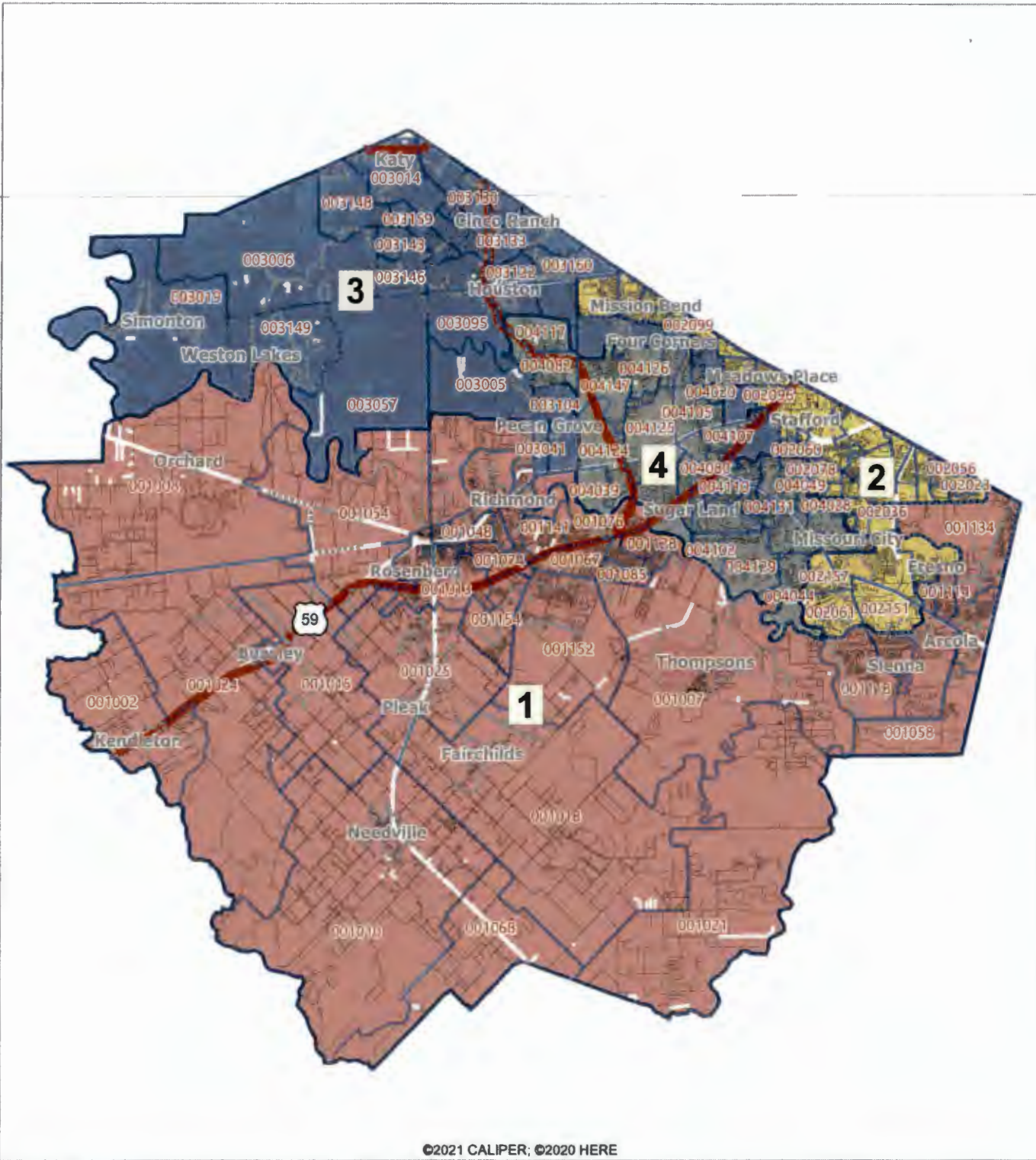
- 50.00% and below
- 50.00% to 80.00%
- 80.00% and above




1 Commissioner Precinct

Allison Bass & Magee LLP
Date 9/14/2021
Data Source Census 2020


MAP 5

JUSTICE/CONSTABLE PRECINCTS



	JP Precinct 1
	JP Precinct 2
	JP Precinct 3
	JP Precinct 4

Fort Bend County
 Initial Assessment
 JP Precincts



Allison, Bass & Magee, LLP
 Data Source: 2020 Census

Exhibit

2

IN THE COMMISSIONERS COURT OF
FORT BEND COUNTY, TEXAS

FINDINGS OF FACT REGARDING POLITICAL BOUNDARIES
OF FORT BEND COUNTY, TEXAS
FOLLOWING PUBLICATION OF 2020 CENSUS DATA
AND
ORDER FOR REDISTRICTING OF POLITICAL BOUNDARIES

On the 12 day of OCTOBER, 2021, the Commissioners Court of Fort Bend County met in regular/called session, having posted notice of said hearing in compliance with Chapter 551 of the Texas Government Code.

The Commissioners Court of Fort Bend County has previously retained the firm of Allison, Bass & Magee, LLP, of Austin, Texas, to conduct an Initial Assessment of existing political boundaries of Fort Bend County, following the issuance of census data by the United States Census Bureau. Attached to this Order, and incorporated herein for all purposes by reference, is a copy of the initial assessment conducted by Allison, Bass & Magee, LLP. This assessment is based upon PL94-171 data, as required by federal law, and is further based upon information provided to Allison, Bass & Magee, LLP by the Texas Legislative Council, other official sources of information, and by Fort Bend County, Texas.

Based upon this information, Fort Bend County has a total maximum deviation of 39.32%. The term total maximum deviation is determined by dividing the total population of Fort Bend County by four, the number of Commissioners Court precincts to determine an ideal precinct size. The actual population of each precinct is then determined, based upon the official population data contained within the census count, as defined by Public Law 94-171. The actual population of each precinct is compared to the ideal precinct size and a range of deviation by percentage is determined. Any total maximum deviation in excess of ten percent (10%) is presumptively unconstitutional under established federal law.

As a result of this determination, Fort Bend County has a constitutional duty to redistrict its political boundaries so as to achieve "One-Person-One-Vote" numerical balance between the four commissioners court precincts at a legally acceptable margin of deviation, and to make such changes as are necessary to comply with the Voting Rights Act and applicable state and federal law.

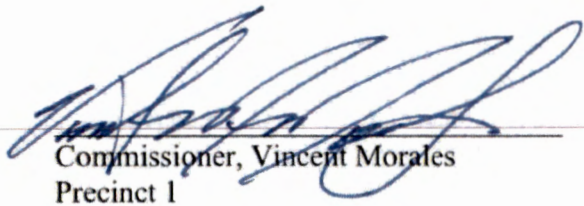
IT IS THEREFORE ORDERED, ADJUDGED and DECREED that the Commissioners Court of Fort Bend County, Texas expressly finds that it has a legal duty to redistrict. The public interest will be served by redrawing the existing political boundaries of Fort Bend County in such a manner as to comply with applicable state and federal law. The Commissioners Court hereby enters the following findings of fact and of law:

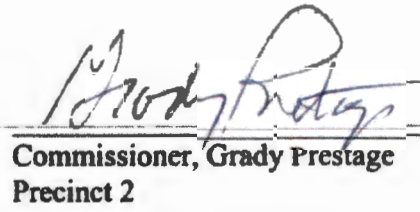
1. Fort Bend County has a total maximum deviation, as defined in this order, of 39.32%.
2. Any total maximum deviation in excess of ten percent (10%) is presumptively unconstitutional under federal law.
3. Fort Bend County, acting by and through its Commissioners Court, is hereby resolved to immediately undertake such necessary and appropriate action to accomplish redistricting of existing commissioners court precincts, and any incidental modification of existing, consolidated, or newly created election precincts necessary to accomplish such redistricting.
4. The Commissioners Court shall henceforth convene in open meetings, duly posted in accordance with the Texas Open Meetings Act, to take up and consider one or more alternative plans for the legal redistricting of Fort Bend County.
5. After due consideration of one or more alternative plans, Fort Bend County shall adopt a plan deemed to satisfy legal requirements, and which best suits the legitimate governmental needs of Fort Bend County.
6. The adopted redistricting plan will address political boundaries of the Commissioners Court, Justice of the Peace and Election precincts of Fort Bend County, and shall remain in effect until altered or amended by subsequent Order of the Commissioners Court.

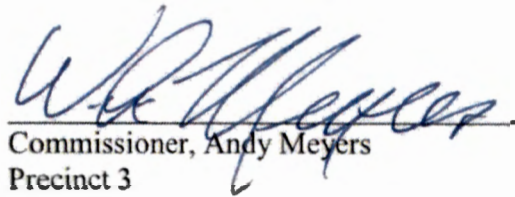
Signed this 12 day of October, 2021.

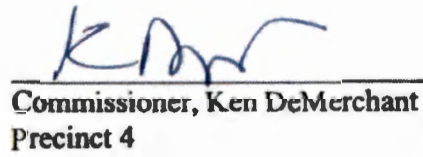


KP George, County Judge


Commissioner, Vincent Morales
Precinct 1


Commissioner, Grady Prestage
Precinct 2


Commissioner, Andy Meyers
Precinct 3

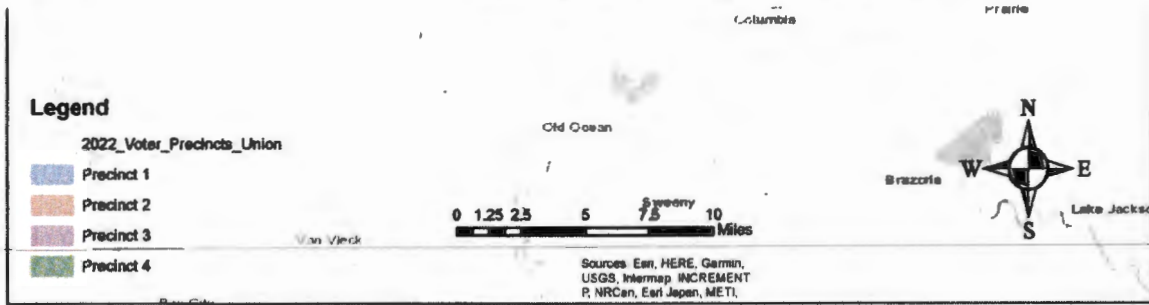

Commissioner, Ken DeMerchant
Precinct 4


County Clerk, Laura Richard



Exhibit

3



Adopted County Precinct Map

County Redistricting

(As ratified by unanimous vote of the Fort Bend Commissioners' Court on October 12, 2021)

Members of the Commissioners Court who wish to submit a proposed county redistricting map must provide those shapefiles to the county's IT department by no later than 10:00am on Tuesday, October 19th, 2021.

These proposed maps will be made available for public display via this website by no later than 5:00pm on Tuesday, October 19th, 2021.

Members of the public who wish to submit a proposed county redistricting map must do so by no later than Noon on Friday, November 5th, 2021.

All proposed redistricting maps submitted by members of the commissioners court or the public must be sent to the county's IT department in electronic shapefile format suitable for online display through standard GIS software.

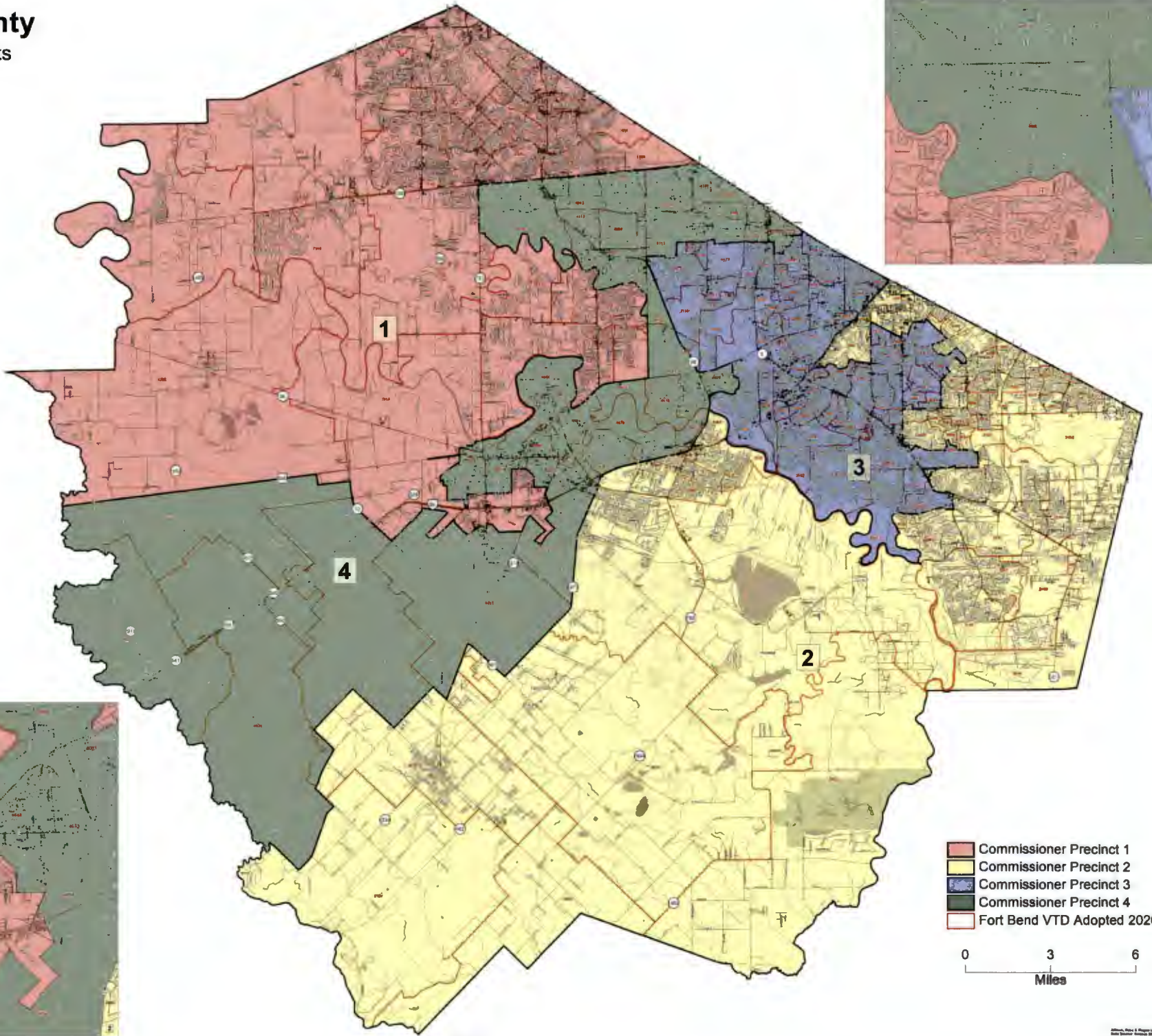


Disclaimer: The Dave's Redistricting website and DRA 2020 application is for general

Fort Bend County

Commissioner Precincts

Adopted



- Commissioner Precinct 1
- Commissioner Precinct 2
- Commissioner Precinct 3
- Commissioner Precinct 4
- Fort Bend VTD Adopted 2020

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