EXCEPTIONS TO THE 1981 PRELIMINARY LEGISLATIVE REAPPORTIONMENT PLAN

by COMMON CAUSE/PENNSYLVANIA.

Common Cause/Pennsylvania, with 10,000 members statewide, has from the outset approached legislative reapportionment with one result in mind: the adoption of a final legislative reapportionment plan that complies with the Constitutions of the Commonwealth and of the United States.

We repeat that constitutionality is our principal goal. This objective was stated in our public testimony before the Legislative Reapportionment Commission (hereinafter "the Commission") on July 9, 1981, and during the question-and-answer period that day, Commission member Senator Edward Zemprelli said that the Constitution would be followed. That is our paramount concern.

Those persons charged with writing the reapportionment plan, the five members of the Commission, are also, we assume, concerned with the constitutionality of the result. However, four of the five members also have other, non-constitutional, concerns that Common Cause does not share.

We recognize that the four members of the Commission, representing the leadership of the Senate and the House of Representatives, are concerned with the fortunes of their respective parties and of their fellow incumbent legislators. But the highest duty of all members of the Commission, a duty imposed by the state Constitution, is to ensure that the constitutionally-mandated criteria are not sacrificed in the process of applying other, non-constitutional, criteria in writing a plan.
Unfortunately, it is clear from examining the preliminary plan that the Commission indeed sacrificed the mandated criteria, producing a plan that is clearly in violation of the Pennsylvania Constitution.

Why did the work of the Commission result in a plan that is unconstitutional? The Commission has given no explicit justification with its proposal, but we believe it flows from the Commission's introduction of the non-constitutional criteria as previously mentioned, such as the protection of incumbents and voter registration figures. The reasons for it, however, are irrelevant. The bottom line is not that these non-constitutional factors were used, but that they were used at the expense of the constitutionally-mandated factors.

Because the proposed plan violates the state Constitution, Common Cause files these exceptions.

How does the preliminary plan violate the Constitution? It violates the Constitution because it meets only one of the three criteria mandated in the Constitution. A constitutional plan must meet all three criteria, in a balanced way.

Article II, Section 16 of the Pennsylvania Constitution establishes the three criteria, as follows. Both senatorial and representative districts "shall be composed of compact and contiguous territory (1) as nearly equal in population as practicable (2)," and "unless absolutely necessary no county, city, incorporated town, borough, township or ward shall be divided (3)" in forming a district.¹

As numbered above, criteria 1 and 3 are not met in the plan submitted by the Commission.

¹ Constitutions of Pennsylvania, Article II, Section 16. The entire section reads as follows: "Legislative Districts Section 16. The Commonwealth shall be divided into fifty senatorial and two hundred three representative districts, which shall be composed of compact and contiguous territory as nearly equal in population as practicable. Each senatorial district shall elect one Senator, and each representative district one Representative. Unless absolutely necessary no county, city, incorporated town, borough, township or ward shall be divided in forming either a senatorial or representative district."
We will elaborate in some detail on the ways in which this plan violates those mandates of the Constitution. But before we do, it is appropriate at this point to discuss the process used by the Commission in arriving at and submitting to the public its preliminary plan.

This is the second such Commission in Pennsylvania, a method of redistricting adopted in 1968 and first used after the 1970 census. Without question, the record of this Commission has been superior to the previous one in terms of opening the process to the public. Some of its meetings were open to the public, and some of the ward maps and census data were made available to Common Cause. For this, we salute the Commission and its members.

But as far as we have progressed since 1971, we have at least as far to go to allow for full and meaningful public input and analysis of the Commission's work. There are certain specific objections that we must incorporate into our exceptions to the plan.

1. There was a critical delay in issuing maps depicting the districts drawn in the preliminary plan. The plan was filed and publicly announced on August 20, but maps were not made public until September 9. Without such maps, it is extremely difficult for citizens, the press or anyone else intelligently to evaluate the plan, and particularly the compactness and contiguity of the new districts. This is doubly important considering the time element for filing exceptions to the plan, with only 10 days remaining in that period after the maps were issued.

Maps should have been provided at the time the plan was filed and submitted to the public.

2. Access to certain critical information was denied for no apparent reason, a denial all the more strange because other, similar information was provided. In particular, the head of the Legislative Data Processing Center refused to provide a copy of a computer tape correlating Census Bureau enumeration districts to...
voting districts. Why? On what basis was it determined, as was cited when the
data was refused, that this tape contained "proprietary information." Moreover,
given the public nature of the Commission and its work, what kind of information
could possibly be deemed secret, and yet still relevant to the drawing of district
boundaries?

There is evidence, in fact, that voter registration data and/or election re-
sults, information not necessary to neutral reapportionment, was contained in the
computer data used by the Commission. An information sheet supplied to Common
Cause by the Commission, attached hereto as Appendix 1, shows that party totals
were included in the data used by the Commission to fashion its district boundary
lines. We call on the Commission to explain what criteria were used and how party
totals were used in writing the plan.

3. Meetings of the Commission, it is impossible to say how many, were held
behind closed doors. It was at these meetings that the real policies of the
Commission were set and the hard decisions made. These meetings should have been
open to the public, whose political future for the next decade was being decided.

4. Policy decisions governing the way in which the plan would be devised
were made, also in secret. No one outside the Commission's closed meetings knows
if the three constitutional criteria were used as the basis for drawing the plan,
underpinning all other decisions. What procedures did the Commission use to ensure
that the Constitution was fully complied with? Particularly, how did the Commission
ensure that new districts would be compact and that no political subdivisions would
be divided unless absolutely necessary? Information regarding the setting of these
policies by the Commission should have been made public, and should still be.

*     *     *     *     *     *

Having raised these points as part of our exceptions to the preliminary plan,
points to which the Commission should respond, we now turn to the specific factors
that render this plan unconstitutional. As we have indicated, there are two. In
plain language, too many districts are not compact, and too many political subdivisions are divided.\^2

With one exception, the Constitution of Pennsylvania is the sole guiding light in judging the plan of the Commission. That one exception, based on federal law and court decisions, states that the voting strength of minorities may not be diluted by reapportionment. All other issues, all other factors, all other determinations as to the legality of the plan must be weighed against the criteria set out in the relevant provisions of the state Constitution.

Those provisions were written by a Constitutional Convention in 1968, and adopted by vote of the electorate of the Commonwealth. The wording of these provisions was debated, and it was adopted for reason.

As the ultimate legal document of the Commonwealth, and as the repository of guarantees made by a government to the people governed, the words of the Constitution are not to be ignored. But there is particular peril in ignoring them regarding a political issue of such magnitude as reapportionment, an issue that goes to the quality of representative government for almost 12 million citizens. If ever there was a time when the strict rule of law should govern the actions of an agent of government, that time is in reapportionment, the very foundation upon which the success or failure of democratic government rests.

Too often in Pennsylvania's political history we have seen the interest of the populace ignored in favor of politicians' self-interest. The political geography of the state as established by legislative redistricting shapes the state's political dynamics for a decade. Through the Constitution, the people of the Commonwealth have instructed their government to write a reapportionment plan in a certain

\^2 We also note that several districts are not contiguous. We are given to understand that these represent errors by the Commission rather than intention. Nevertheless, we are compelled to point out for the record that such a plan is unconstitutional, and we are disappointed that given the delay in issuing maps at all, they could not accurately reflect the districts as intended by the Commission.
way. Not only have they set up the mechanism for doing so, they have mandated the criteria to be used. It is not for the Commission to pick and choose among the criteria, or to elevate one over the other two. The wording of Section 16 is clear on its face: three balanced and equal criteria are set forth.

The very establishment of several constitutional criteria, in fact, serves to balance the way in which districts are drawn. While population changes over time, the other two factors do not. With rare exceptions, political subdivision lines remain the same, census after census. And a geographically compact district remains compact.

Between any two decennial reapportionments, population shifts cause wide swings in the size of districts. Obviously, it is not practically possible, nor is it required by law, to redistrict more frequently than every 10 years. But because a decade passes between reapportionments, population equality among districts, no matter how precisely achieved when the plan is written, is a fleeting accomplishment.

Striking evidence of the results of a mobile population and varying growth rates can be found within Pennsylvania. In looking at just two House districts, one which lost population in the seventies and one which gained population during the decade, it is easy to see the wide swings in population that occur in a 10-year period.

When the 196th district in Philadelphia was formed after the 1970 census, its population was 56,749. In the 1980 census, that district's population had dropped to 40,329, a 29% decrease over 10 years.

Similarly, when the 13th district in Chester and Lancaster counties was drawn in 1971, its population was 57,033. According to the 1980 census, that district now has 70,863 people, a 24% increase. To put it another way, districts that when drawn were only 284 people apart are now 30,534 people apart.

Elevating mere population equality to a position of paramount importance, to
the detriment of the other two criteria, totally disregards the inevitable impact of these kinds of population shifts.

Further, it is impossible for the Census Bureau accurately to count every resident of the state anyway. In fact, the 1980 data used by the Commission did not include part of one municipality at all: the population of the Allegheny County portion of Trafford Borough was not recorded in the tabulations.

Lawsuits alleging substantial undercounts, particularly in urban areas, have been filed all around the country, including Philadelphia. And the Census Bureau itself acknowledges that some people will always be missed in counting population. Of course, there is no argument that at the time the plan is written, closer is better in terms of population equality. But trying to support a plan entirely on the notion that exact population equality has been achieved is chasing a phantom.

It is for that reason, we suspect, that the Constitution in its wisdom does not fall into that trap. It does not permit a reapportionment plan that relies only on population equality, but rather requires that such equality be coupled with compactness and whole political subdivisions. Districts that are compact and that respect political boundaries in 1981 will retain these assets in 1991, long after population equality has vanished.

It is a political fact of life that one person's vote will not exactly equal another person's vote after 10 years, after five years, or after one year; nor even right now, the data being more than a year old already. So the Constitution does more than promise the people of Pennsylvania that their districts will be approximately equal in population. It goes further, and makes two guarantees to the citizenry which the Commission can keep over the length of a decade.

Unfortunately, this plan, this Commission, breaches that guarantee to the citizens, by substituting on its own a plan pegged virtually solely to population figures. This population equality overkill, not required by the Constitution, is not in the interest of the 11.9 million persons who live in the Commonwealth.
We shall now examine the two ways in which the preliminary plan fails to abide by the Constitution, beginning with the dividing of political subdivisions. We find it necessary here to repeat the precept of the Constitution: that no political subdivision be divided unless absolutely necessary (emphasis added).

In violation of that constitutional mandate, we find that the Commission's plan engages in wholesale splitting of counties, municipalities and wards. In some cases, even voting precincts, the smallest unit, were split in two.

A comparison to the reapportionment plans of 1971 and 1966 finds that in virtually every category, and certainly in total number, this plan divides more political subdivisions than either of its two predecessors.

In the Senate plan, the total number of splits was 13 in 1966, 36 in 1971, and 43 in this plan. In the House, the same figures were 30 in 1966, 169 in 1971 and 247 in this plan.³

It is sheer nonsense to assume that splitting of this magnitude was "absolutely necessary."

Looking at the data for this plan alone brings about the same conclusion. Out of a total of 203 House districts, only 27 districts contain no divided political subdivisions. But in 139 districts there are at least two split units, in 28 of these districts there are five or more splits, and in two of these districts there are an appalling nine splits. Again, there can be no reasonable justification for violating the Constitution to this degree, and the Commission has not even attempted to offer one.

³The figures for the 1966 and 1971 plans were obtained from the dissenting opinion of Justice Pomeroy in Commonwealth ex rel. Spector v. Levin, 448 Pa. 1, 293 A. 2d 15 (1972). The corresponding figures for this preliminary plan were obtained by actual count. One split of a political subdivision means that the subdivision has been divided once, into two legislative districts. Two splits of a political subdivision means that the subdivision has been divided twice, into three legislative districts.
Finally, while not relevant to the plan as a whole, it is enlightening to illustrate the folly of this preliminary plan with several particularly flagrant examples from the House plan. In 41 cases, a single voting precinct was cut off from the rest of its ward or voting district. In 15 of those cases, that single precinct was lopped off from the rest of its municipality (city, township, borough) and placed in a separate legislative district.

In Bucks County, all of Falls Township was placed in the 140th district, except for one precinct placed in the 141st. Conversely, the rest of the 141st has all of Bristol Township, except for one precinct given back to the 140th, and one other precinct placed in the 142nd.

In Allegheny County, numerous such examples can be found, such as the 45th district, which is entirely made up of areas in the Pittsburgh suburbs, except for one precinct taken from the City of Pittsburgh.

In Philadelphia, 18 of the 29 House districts in the city include parts of at least four wards. Fully half of the 66 wards in Philadelphia are split at least once, and 10 of those are split at least two times.

There are five townships -- Darby, Maple and Upper Darby in Delaware County, South Whitehall in Lehigh County and Swatara in Dauphin County -- that are divided at least twice, into at least three different House Districts. In fact, two wards in Darby Township are themselves divided into three legislative districts each.

The recitation of these specific examples of some of the worst cases is not to be construed as a complete list. We cite these numbers and some specific districts to illustrate a wholesale violation of the Constitution's clear mandate not to split political subdivision "unless absolutely necessary." It is the plan as a whole that fails to comply with the Constitution. These examples serve to vividly demonstrate, in a way that a broadly-worded critique could not, how the Commission-created standard of population super-equality resulted in a failure to respect political subdivision integrity as required.
We turn now to the other element of the Constitution not adhered to by the plan, compactness.

In the short time since the Commission issued its maps depicting the preliminary plan, it was impossible to conduct a proper, scientific analysis of compactness. Nevertheless, it is possible to look at those maps and to see that there are a number of districts that are anything but compact.

In a list that we do not consider all-inclusive, we would point out the following districts that are not compact:

Senate districts: 1, 2, 4, 20, 29, 40 and 48

* * * * *

From our study of this reapportionment plan and the 1980 data for Pennsylvania, Common Cause believes it is possible to comply with the rule of our Constitution. That rule tells us not that population must be as equal as possible, but as nearly equal as practicable. That is, as equal as can be made within the strictures of the other two criteria. The use of the word "practicable" requires that population deviation standards be married to the other two criteria, fitting together with them, providing a balancing of criteria which serves the citizens as the framers contemplated, not as each individual Commission designates.

Common Cause has discovered that districts can be drawn which will be very close in population, well within any standard ever adopted or required by any court, and which also surpass this plan in compactness and in minimizing the amount of subdivision splitting.

Such a plan is required by the state Constitution. It has also been explicitly upheld (perhaps even encouraged) by the Supreme Court of the United States. The Court has held that in determining standards for state legislative districts, the state may utilize criteria that, in its judgement, reduce the possibility of
political gerrymandering and/or respect the integrity of political subdivisions. 4

Clearly, such a "rational state policy" as contemplated in Reynolds has been adopted by Pennsylvania. Just as clearly, the Commission has substituted its own irrational "equate" policy. In so doing, political subdivisions are divided beyond what is "absolutely necessary" to divide, and districts are not compact. Because of that result, the preliminary plan is unconstitutional.

Common Cause respectfully files these exceptions, with the request that the Commission serve the interest of the Commonwealth’s citizens before its own political considerations, by completely revising its preliminary plan and writing a new, constitutional, plan for the entire state.

We must add that we do not make this request because we have concluded that this plan is "bad" or that it favors some interests over others. As we stated at the beginning, our concern is not with who gets hurt and who gets helped. Others have filed exceptions before you. They may seek to change the preliminary plan in some way. We are not aligned with any individual or group except those identified as part of our coalition, endorsing these exceptions.

Any reapportionment plan is political. Any reapportionment plan will favor somebody. This plan does, and if a new plan is written, it will, too.

The problem is not that this plan is political per se. This plan is not acceptable because it fails to conform to the Constitution's mandates. It is our aim that any final plan adopted in Pennsylvania meets the full measure of our constitutional provisions. It is the Commission's responsibility to write a plan that does so. Pennsylvanians cannot afford to settle for less.

4 Reynolds v. Sims, 377 U.S. 533 (1964). Also Swann v. Adams, 385 U.S. 440 (1967). Only if such a state determination is merely a ruse for discriminating against minority voting interests, not the case here, is such a state determination constitutionally impermissible.
<table>
<thead>
<tr>
<th>EXTENT</th>
<th>COUNTY CO</th>
<th>CODE E</th>
<th>DISTRICT CODE</th>
<th>TOWNSHIP (CBT NAME)</th>
<th>LEVEL 1</th>
<th>LEVEL 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>F-T</td>
<td>2 2 5 4 6</td>
<td>7-8</td>
<td>9-10</td>
<td>11-15</td>
<td>14</td>
<td>58 59</td>
</tr>
<tr>
<td></td>
<td>19 10 2 2</td>
<td>2 2 5 6</td>
<td>2 2 5</td>
<td>3 2</td>
<td>23 0</td>
<td>21 0</td>
</tr>
<tr>
<td></td>
<td>36 57 38</td>
<td></td>
<td></td>
<td></td>
<td>58 59 60</td>
<td>80</td>
</tr>
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- CBT 2-CITY 4-TOWNSHIP (Id: Inc. Town L - Borough)
- WD 2-WARD KL-UNPD
- 0 = DISTRICT
- P = PRECINCT

**Data Cell 1**

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**Data Cell 100**

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### APPENDIX II

#### LEGISLATIVE REAPPORTIONMENT COMMISSION PRELIMINARY PLAN, 1981

Analysis by Common Cause/Pennsylvania

<table>
<thead>
<tr>
<th>POLITICAL SUBDIVISION</th>
<th>NUMBER OF SPLIT POLITICAL SUBDIVISIONS</th>
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</thead>
<tbody>
<tr>
<td>Counties other than Phila.</td>
<td>50 43 20</td>
</tr>
<tr>
<td>Philadelphia County</td>
<td>1 1 0</td>
</tr>
<tr>
<td>Cities, Boroughs, and Townships</td>
<td>107 47 10</td>
</tr>
<tr>
<td>Wards other than in Phila.</td>
<td>56 42 0</td>
</tr>
<tr>
<td>Wards in Philadelphia</td>
<td>33 34 0</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td>247 169 30</td>
</tr>
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</table>

#### NUMBER OF SPLIT POLITICAL SUBDIVISIONS IN EACH HOUSE DISTRICT

<table>
<thead>
<tr>
<th>Number of House districts</th>
<th>Split Political Subdivisions</th>
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<tbody>
<tr>
<td>27 districts have</td>
<td>0 split political subdivisions</td>
</tr>
<tr>
<td>37 districts have</td>
<td>1 split political subdivisions</td>
</tr>
<tr>
<td>49 districts have</td>
<td>2 split political subdivisions</td>
</tr>
<tr>
<td>39 districts have</td>
<td>3 split political subdivisions</td>
</tr>
<tr>
<td>23 &quot; &quot; &quot;</td>
<td>4 split political subdivisions</td>
</tr>
<tr>
<td>12 &quot; &quot; &quot;</td>
<td>5 split political subdivisions</td>
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<tr>
<td>8 &quot; &quot; &quot;</td>
<td>6 split political subdivisions</td>
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<tr>
<td>4 &quot; &quot; &quot;</td>
<td>7 split political subdivisions</td>
</tr>
<tr>
<td>2 &quot; &quot; &quot;</td>
<td>8 split political subdivisions</td>
</tr>
<tr>
<td>2 &quot; &quot; &quot;</td>
<td>9 split political subdivisions</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>203 split political subdivisions</td>
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#### Municipalities in Pennsylvania with more than 2 splits:

<table>
<thead>
<tr>
<th>TOWNSHIP</th>
<th>COUNTY</th>
<th>NUMBER OF HOUSE DISTRICTS INTO WHICH IT IS DIVIDED</th>
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<tbody>
<tr>
<td>Swatara</td>
<td>Dauphin</td>
<td>3</td>
</tr>
<tr>
<td>South Whitehall</td>
<td>Lehigh</td>
<td>3</td>
</tr>
<tr>
<td>Upper Darby</td>
<td>Delaware</td>
<td>3</td>
</tr>
<tr>
<td>Marple</td>
<td>Delaware</td>
<td>3</td>
</tr>
<tr>
<td>Darby</td>
<td>Delaware</td>
<td>4</td>
</tr>
<tr>
<td>1st ward</td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>5th ward</td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Philadelphia Ward</td>
<td>17</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>7</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>49</td>
<td>4</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>53</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>66</td>
<td>3</td>
</tr>
</tbody>
</table>

Pittsburgh line crossed 7 times by House Districts.
Allegheny County line crossed 2 times by House Districts.
CERTIFICATE OF SERVICE

AND NOW, this 12th day of November, 1981, I hereby certify that I caused a true and correct copy of the within Petition For Review to be personally served upon the commission and individual listed listed below:

Legislative Reapportionment Commission
Room 217
Finance Building
Harrisburg, Pennsylvania

The Honorable Leroy Zimmerman
Attorney General
Commonwealth of Pennsylvania
Strawberry Square, 16th Floor
Harrisburg, Pennsylvania, 17120

Respectfully submitted,

WIDOFF, REAGER, SELKOWITZ & ADLER, P.C.

By: [Signature]

Larry B. Selkowitz
IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT

COMMON CAUSE, : 
     Petitioner : 
   and : 

THOMAS H. DEWALL, : 
     Petitioner : 
   and : 

TERRY K. WHEELE, Esquire, : 
     Petitioner : 
    v. : 

LEGISLATIVE REAPPORTIONMENT COMMISSION, : 
     Respondent : 

BRIEF FOR PETITIONER

PETITION FOR REVIEW OF FINAL PLAN
OF LEGISLATIVE REAPPORTIONMENT COMMISSION

Larry B. Selkowitz, Esquire
Widoff, Reager, Selkowitz & Adler, P.C.
1104 Fernwood Avenue
Camp Hill, PA 17011
(717) 763-1383

Dated: December 4, 1981

497-525
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I. STATEMENT OF JURISDICTION

This Court has jurisdiction of this matter pursuant to the Pennsylvania Constitution, Article 2 § 17(d) and 42 Pa. C.S.A. § 725(1).
II. DECISION IN QUESTION

The decision in question is the final legislative reapportionment plan of the Legislative Reapportionment Commission, written pursuant to Article 2, Section 17, of the Constitution, copies of which have been prepared by the Commission.
III. STATEMENT OF THE QUESTIONS INVOLVED

Does the final plan of the Legislative Reapportionment Commission comport with the requirements of Article 2, Section 16, of the Pennsylvania Constitution?

Answered in the affirmative by the adoption of the plan in its final form.
IV. STATEMENT OF THE CASE

On August 20, 1981, the Legislative Reapportionment Commission filed a Preliminary Reapportionment Plan pursuant to Article 2, Section 17(c) of the Constitution. After accepting written exceptions and oral testimony, a final plan was filed on October 13, 1981. On November 12, 1981, the Petition for Review was filed. The plan sets forth in tabular fashion the makeup of all Senatorial and House districts which comprise the General Assembly of this Commonwealth. No explanation of the need for the number of splits of political subdivisions has ever been provided, nor have any reasons been given for the rejection of any exceptions filed by various interested parties or by the Petitioners herein.
V. SUMMARY OF ARGUMENT

The Constitution of the Commonwealth requires that legislative reapportionment be accomplished so as to provide legislative districts which are compact, contiguous, as nearly equal in population as is practicable, and which do not split political subdivisions any more than is absolutely necessary. These standards must all be obeyed. The Legislative Reapportionment Commission chose to follow only one—population equality. The Commission's final plan unconstitutionally fails to provide compactness and, more flagrantly, failed to protect the integrity of political subdivisions. The unnecessary splitting of subdivisions serves to impair the viability of local political subdivisions, a result not required by any standard of population equality, and one which the framers of the Constitution specifically chose to prevent. Indeed, alternative plans are readily available which provide reasonable population equality and which also prevent the splitting of political subdivisions unless absolutely necessary.
VI. ARGUMENT

Introduction

Due apparently to the press of time or other important considerations, this Honorable Court has determined to expeditiously hear arguments and consider the various Petitions for Review which seek to challenge the final House and Senate reapportionment plans as drafted by the Legislative Reapportionment Commission (hereinafter Commission). Common Cause, and the additional Petitioners named herein, are providing this Brief in order to assist the Court in this difficult undertaking. However, due to the pace of the proceedings, this Brief touches only on the broad issues and principles involved. Far more could be written, and more intensive analysis could be provided from which the discussion would profit, were time to permit. Nevertheless, Petitioners believe that the arguments set forth herein are persuasive, and that this Court should find that the final plan of the Commission is unconstitutional, and should remand the matter to the Commission for redrafting in accordance with the constitutional provisions.


Article 2 § 16 of the Pennsylvania Constitution reads as follows:
The Commonwealth shall be divided into fifty senatorial and two hundred three representative districts, which shall be composed of compact and contiguous territory as nearly equal in population as practicable. Each senatorial district shall elect one Senator, and each representative district one Representative. Unless absolutely necessary no county, city, incorporated town, borough, township or ward shall be divided in forming either a senatorial or representative district.

Thus, there are three (3) criteria which must be followed in reapportioning the House and Senate districts of the General Assembly:

1. The districts must be as nearly equal in population as practicable.
2. The territories must be compact and contiguous.
3. No political subdivision or ward shall be divided unless absolutely necessary.

In simple terms, the Commission's plan provides too much of criterion 1 and not enough of criteria 2 and 3 to pass constitutional muster.

The standard method of measuring the degree of population diversity or equality is to compare the optimum population size for the district with the populations of the reapportioned districts. In this criterion, the Commission has excelled. Indeed, if population equality was the one and only test, the Commission would get an A. The maximum deviation of population size for the Senate is 1.93%. That is, from the smallest district, relative to
the preferred size, to the largest, there is only a deviation of 1.93%.* The average deviation was only .48%. In the House, the average deviation was about .5%, with the maximum deviation only 2.82%. These statistics compare remarkably with those of both the prior years and other jurisdictions. The maximum deviations under the prior plan for the House and Senate respectively were 5.46% and 4.31%.

The U.S. Supreme Court has approved deviations of more than 5% (Gaffney v. Cummings, 412 U.S. 735, 37 L.Ed. 2d 298, 93 S.Ct. 2321 (1973) allowing deviations up to 7.83%; White v. Regester, 412 U.S. 755, 37 L.Ed. 2d 314, 93 S.Ct., 2332 (1973) allowing deviations up to 9.9%) and this Court has similarly ruled (Specter v. Levin, 293 A.2d 15, 448 Pa. 1 (1972)). Thus, the goal of population equality has certainly been met. However, this slavish obedience to mechanical equality has rendered the plan unconstitutional, not because it is too far from "perfection," nor because it is too close to "perfection;" rather, because in getting so close to ideal sizes, the Commission has determined that it is not necessary to adhere to the other constitutional requirements. That is, principles 2 and 3 above have been sacrificed for numbers.

*The ideal size is 237,334. The smallest district is the 35th, with 235,069 people, or .9905% of ideal; and the largest is the 25th district, with 239,661 people, or 1.0098% of ideal.

-8-
As there is no record for this Court to review and no complete evidentiary record being created before this Court, there is no specific statement or confession by the Commission that this sacrifice of the Constitution in fact took place. It is apparent, however, from the results and from the ease with which permissible population divisions could have been constructed without violating the other requirements.

1. Political Subdivisions Were Split When Not Absolutely Necessary.

The analysis begins with the statistics as shown in the following table:

<table>
<thead>
<tr>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>235</td>
<td>169</td>
<td>30</td>
<td>45</td>
<td>36</td>
<td>13</td>
</tr>
</tbody>
</table>

Thus, the number of splits of political subdivisions has increased by 39% in the House and 19% in the Senate since the last apportionment. The increase over the Court-fashioned apportionment plan of 1966 is 683% for the House and 230% for the Senate. These numbers suggest that the increased number of splits in both houses was simply not absolutely necessary in order to achieve populations that were constitutionally acceptable as being as nearly equal as practicable. However, this lack of constitutionality is much more than a numbers game.
The U.S. Supreme Court, in establishing criteria for state legislative apportionment, the citizens of Pennsylvania, through constitutional amendment, and this Honorable Court have recognized that there are legitimate state policies to be furthered by a legislative reapportionment plan which protects the integrity of political subdivisions while meeting practicable population guidelines.

The Court in Reynolds v. Sims, 377 U.S. 533 at 579 (1964), in laying out the permissible exceptions to exact population equality permitted divergencies "based on legitimate considerations incident to the effectuation of a rational state policy." One such consideration "... is that of insuring some voice to political subdivisions, as political subdivisions." Reynolds, at 581.

The citizens of Pennsylvania, through constitutional amendment, as cited above, gave a specific obligation to the Commission to respect the boundaries of political subdivisions and wards "unless absolutely necessary." (emphasis added) This Court in Specter v. Levin, supra at 18, similarly approved of the propriety of this provision and of the Commission's duty to abide thereby.

Further, this Court, in Specter, at p. 25, specifically found that the Pennsylvania constitutional provision preventing the unnecessary splitting of political
subdivisions was obviously intended "to prevent partisan gerrymandering." See also Reynolds, at p. 581, approving of the recognition of political subdivisions to protect against gerrymandering.

Of course, there will be times when splits are inevitable to satisfy the goal of practicable equality of population. As this Court stated in Specter, at 22:

It should also be noted that under any scheme of reapportionment that aims at substantial equality of population, a certain amount of subdivision fragmentation is inevitable. For example, when a political subdivision such as Luzerne County has a population which is approximately 1.45 times as large as the ideal Senatorial district population it is inevitable that the county will be split between at least two Senatorial districts.

The Court then cited with approval, at page 23, that 74.6% of this state's counties were divided among the ideal number of Senate districts, and only 25.4% of the counties were divided into more than the ideal number of Senate districts.

However, in the present plan, the Commission made splits which went far beyond any fair notion of necessity. For example, consider the actual number of districts into which the following counties were divided, compared to the ideal number suggested by their populations. This was a method of analysis utilized by this Court in approving the plan in 1971.
<table>
<thead>
<tr>
<th>Senate</th>
<th>Ideal Number of Districts</th>
<th>Commission Number of Districts</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Monroe</td>
<td>0.3</td>
<td>4</td>
</tr>
<tr>
<td>2. Westmoreland</td>
<td>1.7</td>
<td>4</td>
</tr>
<tr>
<td>3. Clarion</td>
<td>0.2</td>
<td>3</td>
</tr>
<tr>
<td>4. Venango</td>
<td>0.3</td>
<td>3</td>
</tr>
<tr>
<td>5. Clearfield</td>
<td>0.4</td>
<td>3</td>
</tr>
<tr>
<td>6. Washington</td>
<td>0.9</td>
<td>3</td>
</tr>
<tr>
<td>7. Montgomery</td>
<td>2.7</td>
<td>5</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>House</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Clearfield</td>
<td>1.4</td>
<td>5</td>
</tr>
<tr>
<td>2. Columbia</td>
<td>1.1</td>
<td>4</td>
</tr>
<tr>
<td>3. Montour</td>
<td>0.3</td>
<td>3</td>
</tr>
<tr>
<td>4. Wayne</td>
<td>0.6</td>
<td>3</td>
</tr>
<tr>
<td>5. Westmoreland</td>
<td>6.7</td>
<td>9</td>
</tr>
<tr>
<td>6. Lehigh</td>
<td>4.7</td>
<td>7</td>
</tr>
<tr>
<td>7. Fayette</td>
<td>2.7</td>
<td>5</td>
</tr>
</tbody>
</table>

These examples from across the State indicate quite clearly that these political subdivisions were divided into far more districts than necessary to meet the standard of substantial population equality. On a broader basis, the Commission plan for the House divides 44% of the counties into more than the ideal number of districts. This must be compared to the 25% number approved in Specter.

It is simply not reasonable for the Commission to have this Court assume, based on no findings or record, that among the many other unneeded splits, 30 of 67 counties had to be divided into more than the number of districts ideally suited to population equality.

As then Chief Justice Jones said in his dissent in Specter, at p. 28:

In the face of constitutional language which prohibits divisions unless "abso-
utely necessary," there surely must be some showing of necessity, some demonstration that "the population principle cannot otherwise be satisfied.

Yet, the Commission has increased the splits beyond the level found questionable by Justice Jones, and has still not explained why this was necessary. Petitioners submit that no such explanation is possible.

The argument for preserving political subdivisions is clear. These entities possess unique and important representational needs and goals. In Pennsylvania, for example, counties are divided into classes having different rights and obligations, depending on the classification. See 16 P.S. § 210, providing for the division of counties into classifications based on population.

This same type of differentiation holds for cities and townships as well. See 53 P.S. § 101 for the classifications of cities and 53 P.S. § 55201 for that of townships.

Thus, to effectively represent his or her constituents, a state senator or representative must be cognizant of the divergent legal and political needs of the classes of municipalities represented. When, for example, the City of Erie (population 119,123) is divided into three rather than two House districts when it is ideally suited to only two districts, its citizens are denied effective representation to the extent their representatives must attempt to express the needs of citizens who are partly
within the city and partly without. Likewise, the citizens of the places outside the city, such as in the Borough of Wesleyville, are deprived of effective representation. This particular deficiency is the subject of another Petition for Review in the Western District of this Court.

In this example, the state's policy of providing effective representation to citizens who have mutual interests by proscribing the unnecessary splitting of political subdivisions is directly violated by the Commission's plan.

Indeed, the commonality of interest which citizens of a political unit share is quite significant. Nearly each area or region of the State has historically developed with reference to certain local interests. These societal and political characteristics include such things as school districts, travel and communication systems, newspapers, radio and television stations, and other factors. Splitting such areas to achieve unnecessarily stringent population ideals strikes at the heart of the rationale for protecting the viability of political subdivisions expressed in the State Constitution, and severely damages the inalienable right to full and effective participation in the political process. Reynolds, at p. 565.

Another example of such arbitrary and unnecessary splitting of political subdivisions took place in the case of Penn Hills Township in Allegheny County. Penn Hills
has a population of 57,632, or only 1.4% smaller than the ideal district size. But under the Commission plan, Penn Hills is split; three divisions of Ward 1 are removed, while a second borough and two divisions of a ward of a third borough are added back. The result was a district not much different in size than Penn Hills, but split unnecessarily across municipal boundaries. In Eastern Pennsylvania, Abington Township (District 153) in Montgomery County has a population of 58,084. This equals 1,011 ideal districts. Stated otherwise, it is only 1.1% larger than ideal. Yet, the Commission removed 3,027 citizens from Abington by eliminating one part of one voting division and another complete voting division and added a separate borough, Rockledge, with a population of 2,538. The net result was a district with 58,595 people, just 489 fewer than Abington by itself. Only now there are competing interests of separate political subdivisions to be represented when it was not necessary.

A third remarkable example is found in Delaware County. The 161st District has a population of 58,074, which is within 1% of the ideal. To this district the Commission added 124 people from one division of Springfield Township for a district population of 58,198, moving it only slightly closer to the ideal. The rest of Springfield Township is all in the 165th District, which has a population of 58,604. Leaving the 124 people in Spring-
field would have yielded a district of 58,728, only 272 people larger than the ideal.

These unnecessary splits represent only a few such instances. This problem exists all across the State. As indicated in Table 1 above, as well as the Appendix to this Brief, political subdivisions are split 235 times in the House plan and 45 times in the Senate plan. In addition, as shown in the Appendix, House districts cross political subdivision lines 234 times, while Senate districts cross such lines 45 times.

Another rational state policy served by respecting political subdivisions is the need for stability of representation as population changes over time. As noted at page 6 of Petitioner Common Cause's Exceptions filed before the Commission, population is a transitory factor, subject to great variations, while the compactness and boundaries of political subdivisions change almost not at all. For example, in 1970, the 196th District in Philadelphia had a population of 56,749. In 1980, the population had dropped 29% to 40,329. Needless to say, its boundaries remained constant. During the same period, the 13th district (Chester and Lancaster Counties) grew from 57,033 to 70,863. Thus, two districts which started only 284 people apart are now 30,534 apart. Yet, the political subdivisions and their interests remained the same. This, we believe, graphically demonstrates another reason why the
framers of the Constitution deemed it necessary to forbid splitting subdivisions in search of an arithmetical exactness that is beyond constitutional requirements.

As the specific examples and the general statistics demonstrate, the Constitution has been foreseen as regards the maintenance of the boundaries of political subdivisions in a flawed effort to achieve an unnecessarily stringent notion of population equality, a notion that sets standards beyond that which any court has ever required.

2. The Constitutional Mandate For Compactness Of Districts Has Been Violated By The Commission Plan.

Closely related to the rationale for maintaining the boundaries of political subdivisions is the requirement that districts be compact. This compactness must be viewed in conjunction with the prohibition against splitting subdivisions. As noted above, the effectiveness of the votes cast in one area is served by keeping those areas of governmental, societal and political affinity together. The Constitution requires this when the goal of reasonable population equality can also be served. However, the Commission has far exceeded reasonable population equality at the expense of compactness.

An example of this failure is aptly provided by the situation in Mercer County in House Districts 7 and 17. In order to fill up its quota for District 7, which
is comprised, in largest part, of the cities of Farrell and Sharon, the Commission took Delaware and Pymatuning Townships out of their former District where they, primarily as rural and suburban territory, shared extensive economic and historical connections with the Boroughs of Greenville, Freedonia and the rest of District 17. These types of contacts did not exist with the predominantly urban concerns of Sharon, Farrell and Sharpsville. Further, both Delaware and Pymatuning Townships are physically quite removed from the urban areas with which they have been joined, since they are separated by the Shenango River Lake and large areas of open space.

These violations of the compactness requirement abound. The harm caused by this abrogation of the Constitutional requirement is addressed in more detail by, among others, counsel for Petitioner Feuchtenberger et al., with specific reference to Cumberland County, and we commit those remarks to the Court for its review. Indeed, the very fact that more than 30 other petitioners have undertaken to challenge the plan before this Court is evidence of the broad-based concern for the lack of constitutionality of this plan.
B. ALTERNATIVE PLANS ARE AVAILABLE WHICH ACHIEVE PRACTICABLE POPULATION EQUALITY WITHOUT VIOLATING THE CONSTITUTIONAL PROHIBITION OF UNNECESSARY SPLITTING OF POLITICAL SUBDIVISIONS.

This Court, in *Specter*, at 293 A.2d 24, expressed a reluctance to act without objective data. Petitioners, in the foregoing sections and the appendices hereto, have supplied much of this data. More is present in the 34 other petitions filed in opposition to the plan. Petitioner Common Cause has gone further. We have provided an alternative plan for both the House and the Senate (Appendix Items 1 and 2), which abides by the Constitution in all respects: it achieves substantial equality of population, while splitting political subdivisions only when absolutely necessary. The tables found in the Appendix as Items 3 and 4 provide further analysis of the Common Cause plan as it compares to the unconstitutional version of the Commission. A brief review of these items is very informative.

The Common Cause plan for the Senate requires the splitting of only 33 political subdivisions as compared to the Commission's 45 splits (See Appendix I, Item 3). In 1971, the approved plan contained only 36 splits. The Commission's version is a 25% increase over 1971.

In the House, Common Cause has drawn a plan having only 117 splits, versus the Commission's 235. The 1971 plan had approximately 169 splits.
More importantly, the Common Cause plan, while reducing the number of splits dramatically, has not sacrificed any of the constitutional standards, as did the Commission's. The Common Cause plan for the Senate achieved its minimal splits with a maximum population deviation of only 1.86% and an average deviation of .45%, closer to numerical equality than that of the Commission, which had a maximum deviation of 1.9% and an average of .48%.

The Common Cause House plan had a maximum deviation of 4.89%, well within reasonable constitutional guidelines (See White and Gaffney, supra). Although slightly higher than the Commission's plan, the deviation from ideal population is more than compensated for by the major reduction in the splitting of political subdivisions.

Of course, Common Cause is not suggesting that the Court adopt this alternative plan. Rather, it is submitted to demonstrate that the Constitution can be followed, in all respects, with relative ease. The Commission chose to follow only one requirement, a choice which renders its plan unconstitutional.

Predictably, the Commission will argue that its plan comes closer than any in the country to exact numerical equality. However, that is not the only test. Reasonable equality, while not destroying the integrity of any more political subdivisions than was absolutely
necessary, should have been the Commission's goal. The results tell us that they had other things in mind. Unfortunately, the full text of Article 2, Section 16, was not among them.
VII. CONCLUSIONS

The Constitution of this Commonwealth has been violated by the Respondent Commission. The same Constitution requires, and Petitioners hereby request, that this Honorable Court remand the matter to the Commission for the preparation of a plan which gives full effect to all the provisions of the Constitution.

Respectfully submitted,

WIDOFF, REAGER, SELKOWITZ & ADLER, P.C.

By: [Signature]

Larry B. Selkowitz
COMMON CAUSE/PENNSYLVANIA

Example of one
alternative plan*
of the

HOUSE OF REPRESENTATIVE DISTRICTS

*There may be discrepancies in population figures in this plan. We are in the process of attempting to correct these.
<table>
<thead>
<tr>
<th>DISTRICT</th>
<th>NUMBER</th>
<th>DESCRIPTION</th>
</tr>
</thead>
</table>
| Dist.    | 1      | **ERIE COUNTY**
|          |        | City of Erie, Ward 1; Ward 2, Divisions 1, 3-5, 7-9; Ward 5, Divisions 1, 3-10, 13-19, and 21.
|          |        | Total Population: 57,959 |
| Dist.    | 2      | **ERIE COUNTY**
|          |        | City of Erie, Wards 3; 4; 5, Divisions 2, 11, 12, and 20; and Ward 6.
|          |        | Total Population: 58,925 |
| Dist.    | 3      | **ERIE COUNTY**
|          |        | Cities of Corry and Erie, Ward 2, Division 6; Townships of Amity, Concord, Greenfield, Harbor Creek, Lawrence Park, Le Boeuf, North East, Union, Venango, and Wayne; and the Boroughs of Elgin, Mill Village, North East, Union City, Wattsburg, and Wesleyville.
|          |        | Total Population: 59,046 |
| Dist.    | 4      | **ERIE COUNTY**
|          |        | Townships of Fairview, McKeans, and Mill Creek; and the Boroughs of Fairview and McKeans.
|          |        | Total Population: 58,216 |
| Dist.    | 5      | **ERIE COUNTY**
|          |        | Townships of Conneaut, Elk Creek, Franklin, Girard, Greene, Springfield, Summit, Washington, and Waterford; and the Boroughs of Albion, Cranesville, Edinboro, Girard, Lake City, Platea, and Waterford.
|          |        | Population: 45,634 |
|          |        | **CRAWFORD COUNTY**
|          |        | Townships of Beaver, Conneaut, Cussewago, Hayfield, Spring, Summerhill, Summit, and Venango; and the Boroughs of Conneautville, Springboro, and Venango.
|          |        | Population: 13,670 |
|          |        | Total of District: 59,304 |
| Dist.    | 6      | **CRAWFORD COUNTY**
|          |        | Total Population: 57,572 |
| Dist.    | 7      | **CRAWFORD COUNTY**
|          |        | Townships of East Fallowfield, Greenwood, North Shenango, Pine, Sadsbury, South Shenango, Vernon, West Fallowfield, and West Shenango; and the Boroughs of Conneaut Lake and Linesville.
|          |        | Population: 17,627 |
|          |        | **MERCER COUNTY**
|          |        | Townships of Cool Spring, Deer Creek, Fairview, French Creek, Greene, Hempfield, Jackson, Lake, Mill Creek, New Vernon, Otter Creek, Perry, Pymatuning, Salem, Sandy Creek, Sandy Lake, Sugar Grove, West Salem, and Worth; and the Boroughs of Freedom, Greenville, Jackson Center, Jamestown, New Lebanon, Sandy Lake, Sheakleyville, and Stoneboro.
<p>|          |        | Population: 41.055 |</p>
<table>
<thead>
<tr>
<th>DISTRICT</th>
<th>NUMBER</th>
<th>DESCRIPTION</th>
</tr>
</thead>
</table>
| Dist. 8  |        | MERCER COUNTY  
CITIES of Farrell and Sharon; TOWNSHIPS of Hermitage, Shenango,  
and South Pymatuning; and the BOROUGHS of Clark, Sharpsville,  
West Middlesex; and Wheatland.  
TOTAL POPULATION: 59,720 |
| Dist. 9  |        | MERCER COUNTY  
TOWNSHIPS of East Lackawannock, Findley, Jefferson, Lack-  
avannock, Liberty, Pine, Springfield, Wilmington, and Wolf  
Creek; and the BOROUGHS of Grove City and Mercer.  
POPULATION: 27,524 |
|          |        | LAWRENCE COUNTY  
TOWNSHIPS of Mahoning, Neshannock, Plain Grove, Pulaski,  
Union, Washington, and Wilmington; and the BOROUGHS of New  
Wilmington and Volant.  
POPULATION: 30,123 |
| Dist. 10 |        | VENANGO COUNTY  
CITIES of Franklin and Oil City; TOWNSHIPS of Canal, Clinton,  
Corplanter, Cranberry, Frenchcreek, Irwin, Jackson, Mineral,  
Oakland, Plum, Richland, Sandycreek, Scrubgrass and Victory;  
and the BOROUGHS of Barkeyville, Clintonville, Cooperstown,  
Emlenton, Polk, Rouseville, Sugar Creek, and Utica; Rockland TOWN-  
SHIP.  
TOTAL POPULATION: 58,605 |
| Dist. 11 |        | WARREN COUNTY  
POPULATION: 47,449 |
|          |        | FOREST COUNTY  
POPULATION: 5,072 |
|          |        | VENANGO COUNTY  
TOWNSHIPS of Allegheny, Cherry Tree, Oil Creek, Pinegrove,  
and President; and the BOROUGH of Pleasantville.  
POPULATION: 5,839 |
|          |        | TOTAL OF DISTRICT: 58,360 |
| Dist. 12 |        | McKean COUNTY  
POPULATION: 50,635 |
|          |        | ELK COUNTY  
TOWNSHIPS of Highland and Jones.  
POPULATION: 2,631 |
|          |        | CAMERON COUNTY  
TOWNSHIP of Shippen; and the BOROUGH of Emporium.  
POPULATION: 5,600 |
<table>
<thead>
<tr>
<th>DISTRICT</th>
<th>NUMBER</th>
<th>DESCRIPTION</th>
</tr>
</thead>
</table>
| Dist.    | 13     | POTTER COUNTY  
              POPULATION: 17,726 |
|          |        | CLINTON COUNTY  
              POPULATION: 38,971 |
|          |        | CAMERON COUNTY  
              TOWNSHIPS of Gibson, Grove, Lumber, and Portage; and the  
              BOROUGH of Driftwood.  
              POPULATION: 1,074 |
|          |        | TOTAL OF DISTRICT: 57,771 |
| Dist.    | 14     | ELK COUNTY  
              TOWNSHIPS of Benzenette, Benzinger, Fox, Horton, Jay, Ridgway,  
              and Spring Creek; and the BOROUGHS of Johnsonburg, Ridgway,  
              and St. Mary's; and the TOWNSHIP of Millstone.  
              POPULATION: 35,707 |
|          |        | CLEARFIELD COUNTY  
              CITY of DuBois; TOWNSHIPS of Bloom, Brady, Huston, Pine,  
              Sandy, and Union; and the BOROUGH of Troutville.  
              POPULATION: 21,818 |
|          |        | TOTAL OF DISTRICT: 57,525 |
| Dist.    | 15     | CLEARFIELD COUNTY  
              TOWNSHIPS of Beccaria, Bell, Bigler, Boggs, Bradford, Burnside,  
              Chest, Covington, Decatur, Ferguson, Girard, Goshen, Graham,  
              Greenwood, Gulich, Jordan, Karthaus, Knox, Lawrence, Morris,  
              Penn, Pike and Woodward; and the BOROUGHS of Brisbin, Burnside,  
              Chester Hill, Clearfield, Coalport, Curvenville, Glen Hope,  
              Grampton, Houtzdale, Irvona, Lumber City, Mahaffey, Newberg,  
              New Washington, Osceola, Ramey, Wallacetown, and Westover.  
              TOTAL POPULATION: 58,891 |
| Dist.    | 16     | JEFFERSON COUNTY  
              POPULATION: 48,303 |
|          |        | INDIANA COUNTY  
              TOWNSHIPS of Banks, Canoe, East Mahoning, Grant, Montgomery,  
              North Mahoning, and West Mahoning; and the BOROUGHS of Cherry  
              Tree, Glen Campbell, Marion Center, and Smicksburg.  
              POPULATION: 9,878 |
|          |        | CLEARFIELD COUNTY  
              BOROUGH of Falls Creek.  
              POPULATION: 50 |
|          |        | TOTAL OF DISTRICT: 58,231 |
| Dist.    | 17     | ARMSTRONG COUNTY  
              TOWNSHIPS of Brady's Bend, Boggs, Honey, Madison,  
              Mahoning, Perry, Pine, Red Bank, Sugar Creek, Washington,  
              Wayne, and West Franklin; and the BOROUGHS of  
              Dayton, Parker City, South Bethlehem, and Worthington.  
              POPULATION: 15,166 |
|          |        | CLARION COUNTY  
              POPULATION: 43,362 |
<table>
<thead>
<tr>
<th>DISTRICT</th>
<th>NUMBER</th>
<th>DESCRIPTION</th>
</tr>
</thead>
</table>
| Dist.    | 18     | BUTLER COUNTY  
CITY of Butler; TOWNSHIPS of Adams, Butler, Connoquenessing,  
Forward, Middlesex, and Penn; and the BOROUGHS of Callery,  
Connoquenessing, Mars, and Valencia.  
TOTAL POPULATION: 58,275 |
| Dist.    | 19     | BUTLER COUNTY  
TOWNSHIPS of Allegheny, Buffalo, Center, Cherry, Clay, Clear-  
field, Clinton, Concord, Donegal, Fairview, Jefferson, Marion,  
Mercer, Oakland, Parker, Slippery Rock, Summit, Venango,  
Washington, and Winfield; and the BOROUGHS of Bruin, Cherry  
Valley, Chicora, East Butler, Eau Claire, Fairview, Harris-  
ville, Karns City, Petrolia, Saxonburg, Slippery Rock, and  
West Sunbury.  
TOTAL POPULATION: 59,448 |
| Dist.    | 20     | LAWRENCE COUNTY  
TOWNSHIP of Perry; and the BOROUGH of Ellwood City.  
POPULATION: 11,260 |
| Dist.    | 21     | BEAVER COUNTY  
TOWNSHIPS of Daugherty, Franklin, Marion, and North Sewickley;  
and the BOROUGHS of Eastvale and Ellwood City.  
BUTLER COUNTY  
TOWNSHIPS of Brady, Cranberry, Franklin, Jackson, Lancaster,  
Muddy Creek, and Worth; and the BOROUGHS of Evans City, Har-  
mony, Portersville, Prospect, West Liberty, and Zelienopole.  
POPULATION: 30,189  
TOTAL OF DISTRICT: 57,699 |
| Dist.    | 22     | LAWRENCE COUNTY  
CITY of New Castle; and the TOWNSHIPS of Hickory, Little  
Beaver, North Beaver, Scott, Shenango, Slippery Rock, and  
Taylor; and the BOROUGHS of Bessemer, Enon Valley, Snip  
and South New Castle.  
TOTAL POPULATION: 58,611 |
| Dist.    | 23     | BEAVER COUNTY  
TOWNSHIPS of Harmony, New Sewickley, Pulaski, and Rochester;  
and the BOROUGHS of Ambridge, Baden, Conway, East Rochester;  
Economy, Freedom, New Brighton, and Rochester.  
TOTAL POPULATION: 59,104 |
| Dist.    | 23     | BEAVER COUNTY  
CITY of Beaver Falls; TOWNSHIPS of Brighton, Chippewa, Darl-  
ington, Patterson, South Beaver, and White; and the BOROUGHS  
of Big Beaver, Bridgewater, Darlington, Fallston, Glasgow,  
Homewood, Koppel, New Galilee, Ohioville, Patterson Heights,  
and West Mayfield.  
POPULATION: 50,953  
LAWRENCE COUNTY  
TOWNSHIP of Wayne; and the BOROUGHS of Ellport, New Beaver,  
and Wampum.  
POPULATION: 7,156  
TOTAL OF DISTRICT: 58,109 |
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| Dist.    | 24     | BEAVER COUNTY  
TOWNSHIPS of Center, Hopewell, and Vanport; and the BOROUGHS  
of Aliquippa, Beaver, Monaca, and South Heights.  
TOTAL POPULATION: 58,369 |
| Dist.    | 25     | ARMSTRONG COUNTY  
TOWNSHIPS of Bethel, Burrell, Cadogan, East Franklin, Gilpin,  
Kiskiminetas, Kittanning, Manor, North Buffalo, Parks,  
Plumcreek, Rayburn, South Bend, South Buffalo, and Valley;  
and the BOROUGHS of Applewold, Apollo, Elderton, Ford City,  
Ford Cliff, Freeport, Kittanning, Leechburg, Manorville,  
North Apollo, and West Kittanning.  
TOTAL POPULATION: 58,284 |
| Dist.    | 26     | INDIANA COUNTY  
TOWNSHIPS of Armstrong, Blacklick, Center, Conemaugh, Rayne,  
South Mahoning, Washington, White, and Young; and the  
BOROUGHS of Creekside, Ernest, Homer City, Indiana, Jackson-  
ville, Plumville, Saltsburg, and Shelocta.  
POPULATION: 54,542 |
|          |        | ARMSTRONG COUNTY  
TOWNSHIP of Cowanshannock; and the BOROUGHS of Atwood and  
Rural Valley.  
POPULATION: 4,318 |
|          |        | TOTAL OF DISTRICT: 58,856 |
| Dist.    | 27     | CAMBRIA COUNTY  
TOWNSHIPS of Barr, Blacklick, Chest, Clearfield, Dean,  
East Carroll, Elder, Reade, Susquehanna, West Carroll,  
and White; and the BOROUGHS of Ashville, Barnesboro,  
Carrolltown, Chest Springs, Hastings, Patton, Spangler,  
and Vintondale.  
POPULATION: 29,231 |
|          |        | INDIANA COUNTY  
TOWNSHIPS of Brush Valley, Buffington, Burrell, Cherry  
Hill, Green, East Wheatfield, Pine, and West Wheatfield;  
and the BOROUGHS of Armagh, Blairsville, and Clymer.  
POPULATION: 27,861 |
<p>|          |        | TOTAL OF DISTRICT: 57,092 |</p>
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| Dist.    | 28     | ALLEGHENY COUNTY  
            BOROUGH of McDonald.  
            POPULATION: 539 |
|          |        | BEAVER COUNTY  
            TOWNSHIPS of Greene, Hanover, Independence, Potter, and  
            Raccoon; and the BOROUGHS of Frankfort Springs, George-  
            town, Hookstown, Industry, Midland, and Shippensport.  
            POPULATION: 19,765 |
|          | 29     | WASHINGTON COUNTY  
            TOWNSHIPS of Blaine, Buffalo, Cecil, Cross Creek, Hanover,  
            Hopewell, Independence, Jefferson, Mt. Pleasant, Robinson,  
            and Smith; and the BOROUGHS of Burgettstown, McDonald,  
            Midway, and West Middletown.  
            POPULATION: 37,239 |
|          | 30     | WASHINGTON COUNTY  
            CITY OF Monongahela; TOWNSHIPS of Carroll, Fallowfield, West  
            Pike Run; and the BOROUGHS of Allenport, Bealsville, Bentley-  
            ville, California, Centerville, Charleroi, Coal Center, Deems-  
            town, Donora, Dunlevy, Elco, Ellsworth, Long Branch, New  
            Eagle, North Charleroi, Roscoe, Speers, Stockdale, and Twilight.  
            TOTAL POPULATION: 58,678 |
|          | 31     | WASHINGTON COUNTY  
            CITY of Washington; TOWNSHIPS of Canton, Donegal, East Finley,  
            Morris, North Bethlehem, North Franklin, Somerset, South  
            Franklin, and West Finley; and the BOROUGHS of Amwell, Clays-  
            ville, Cokeburg, East Washington, Greenhills Boro, Marianna,  
            West Alexander, and West Bethlehem.  
            TOTAL POPULATION: 58,286 |
|          | 32     | WASHINGTON COUNTY  
            TOWNSHIP of East Bethlehem; and the BOROUGH of West Brownsville.  
            TOTAL POPULATION: 4,786 |
|          |        | GREENE COUNTY  
            TOTAL POPULATION: 40,355 |
|          |        | FAYETTE COUNTY  
            TOWNSHIPS of Brownsville, Jefferson, and Luzerne; and the  
            BOROUGHS of Brownsville, and Newell.  
            TOTAL POPULATION: 13,422 |
|          | 33     | TOTAL OF DISTRICT: 58,563 |
|          |        | FAYETTE COUNTY  
            CITY of Uniontown; and the TOWNSHIPS of Georges, German,  
            Menallen, Nicholson, South Union, and Springhill; and the  
            BOROUGHS of Fairchance, Masontown, Point Marion, and Smith-  
            field,  
            TOTAL POPULATION: 58,531 |
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| Dist.    | 34     | FAYETTE COUNTY  
CITIES of Connellsville and Fayette; TOWNSHIPS of Dunbar, Franklin, North Union, Perry, Redstone, and Washington; and the BOROUGHS of Belle Vernon, Dawson, Dunbar, Perryopolis, and Vanderbilt.  
TOTAL POPULATION: 59,024 |
| Dist.    | 35     | FAYETTE COUNTY  
TOWNSHIPS of Bullskin, Connellsville, Henry Clay, Lower Tyrone, Saltlick, Springfield, Steward, Upper Tyrone, and Wharton; and the BOROUGHS of Everson, Markleysburg, Ohiopyle, and South Connellsville.  
POPULATION: 29,418 |
|           |        | SOMERSET COUNTY  
TOWNSHIPS of Addison, Allegheny, Black, Brothers Valley, Elk Lick, Fairhope, Greenville, Larimer, Lower Turkeyfoot, Middle Creek, Milford, Northampton, Southampton, Stony Creek, Summit, and Upper Turkeyfoot; and the BOROUGHS of Addison, Berlin, Callimont, Casselman, Confluence, Garrett, Indian Lake, Meyersdale, New Baltimore, New Centerville, Rockwood, Salisbury, Seven Springs, Shanksville, Ursina, and Wellersburg.  
POPULATION: 28,411 |
| Dist.    | 36     | WESTMORELAND COUNTY  
CITY of Monessen; TOWNSHIPS of East Huntingdon; Hempfield, PART: Districts of New Stanton and Weavers Old Stand; Rostraver; and South Huntingdon; and the BOROUGHS of Hunker, New Stanton, North Bell Vernon, Scottsdale, Smithton, West Newton, and Youngwood.  
TOTAL POPULATION: 59,349 |
| Dist.    | 37     | WESTMORELAND COUNTY  
CITY of Jeannette; TOWNSHIPS of Hempfield, PART: Districts of East Adamsburg, High Park, Wegley, and West Adamsburg; and North Huntingdon; and the BOROUGHS of Adamsburg, Irwin, Penn, and North Irwin.  
TOTAL POPULATION: 57,261 |
| Dist.    | 38     | WESTMORELAND COUNTY  
CITY of Greensburg; TOWNSHIP of Hempfield, PART: Districts of Alvina, Bovard, Carbon, Eastview, Fort Allen, Foxhill, Gayville, Grapeville, Hannastown, Haydenville, Lincoln Heights, Lincoln Heights West, Luxor, Maplewood, Middle­town, North Carbon, Sibel, Todd, University, Valley, Wendel­Herm, and West Point; and the BOROUGHS of Arona, Madison, South Greensburg, and Southwest Greensburg.  
TOTAL POPULATION: 59,069 |
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| Dist.    | 39     | WESTMORELAND COUNTY  
MUNICIPALITY of Murraysville; TOWNSHIPS of Bell, Loyalhanna, Penn, Salem, and Washington; and the BOROUGHS of Avonmore, Delmont, Export, and Manor.  
TOTAL POPULATION: 58,039 |
| Dist.    | 40     | WESTMORELAND COUNTY  
CITIES of Arnold, Lower Burrell, and New Kensington;  
TOWNSHIPS of Allegheny and Upper Burrell; and the BOROUGHS of East Vandergrift, Hyde Park, Oklahoma, Vandergrift, and West Leechburg.  
TOTAL POPULATION: 58,228 |
| Dist.    | 41     | WESTMORELAND COUNTY  
TOWNSHIPS of Derry, Fairfield, St. Clair, and Unity; and the BOROUGHS of Bolivar, Derry, Latrobe, New Alexandria, New Florence, and Seward, and Youngstown.  
TOTAL POPULATION: 57,371 |
| Dist.    | 42     | ALLEGHENY COUNTY  
TOWNSHIPS of Elizabeth, Forward, North Versailles, and South Versailles; and the BOROUGHS of Elizabeth, Lincoln, Trafford, West Elizabeth, and White Oak.  
POPULATION: 47,931 |
|          |        | WESTMORELAND COUNTY  
TOWNSHIP of Sewickley; and the BOROUGHS of Sutersville and Trafford.  
POPULATION: 11,620 |
|          |        | TOTAL OF DISTRICT: 59,581 |
| Dist.    | 43     | ALLEGHENY COUNTY  
CITIES of Dusquesne and McKeesport; and the BOROUGHS of Glassport, Liberty, Port Vue, and Versailles.  
TOTAL POPULATION: 57,926 |
| Dist.    | 44     | ALLEGHENY COUNTY  
TOWNSHIP of Wilkins; and the BOROUGHS of Chalfant, East McKeesport, Monroeville, Pitcairn, Turtle Creek, Wall, and Wilmerding.  
TOTAL POPULATION: 58,052 |
| Dist.    | 45     | ALLEGHENY COUNTY  
BOROUGH of Penn Hills.  
TOTAL POPULATION: 57,632 |
| Dist.    | 46     | ALLEGHENY COUNTY  
TOWNSHIPS of Harmar and O'Hara; and the BOROUGHS of Aspinwall, Blawnox, Fox Chapel, Oakmont, Plum, and Verona.  
TOTAL POPULATION: 58,288 |
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| Dist.    | 47     | ALLEGHENY COUNTY  
TOWNSHIPS of East Deer, Fawn, Frazer, Harrison, Richland, Springdale, and West Deer; and the BOROUGHS of Brackenridge, Cheswick, Springdale, and Tarentum.  
TOTAL POPULATION: 57,352 |
| Dist.    | 48     | ALLEGHENY COUNTY  
BOROUGHS of Braddock, Braddock Hills, East Pittsburgh, Homestead, Munhall, North Braddock, Rankin, Swissvale, West Homestead, and Whitaker.  
TOTAL POPULATION: 57,998 |
| Dist.    | 49     | ALLEGHENY COUNTY  
CITY of Clairton; and the BOROUGHS of Dravosburg, Jefferson, Pleasant Hills, and West Mifflin.  
TOTAL POPULATION: 59,297 |
| Dist.    | 50     | ALLEGHENY COUNTY  
TOWNSHIP of South Park, Districts 1, 5 and 7; and the BOROUGHS of Baldwin, Brentwood, and Whitehall.  
TOTAL POPULATION: 58,844 |
| Dist.    | 51     | ALLEGHENY COUNTY  
TOWNSHIPS of South Park, Districts 2, 3, 4, and 6; and Upper St. Clair; and the BOROUGH of Bethel Park.  
TOTAL POPULATION: 60,180* |
| Dist.    | 52     | ALLEGHENY COUNTY  
TOWNSHIPS of Baldwin and Mt. Lebanon; and the BOROUGHS of Castle Shannon and Dormont.  
TOTAL POPULATION: 58,533 |
| Dist.    | 53     | ALLEGHENY COUNTY  
TOWNSHIPS of Collier, Scott, and South Fayette; and the BOROUGHS of Bridgeville, Carnegie, Green Tree, and Heidelberg.  
TOTAL POPULATION: 58,764 |
| Dist.    | 54     | ALLEGHENY COUNTY  
TOWNSHIPS of Kennedy, North Fayette, Robinson, and Stowe; and the BOROUGHS of Crafton, Ingram, McKees Rocks, Oakdale, Pennsbury Village, Rosslyn Farms, and Thornburg.  
TOTAL POPULATION: 57,639 |
| Dist.    | 55     | ALLEGHENY COUNTY  
TOWNSHIPS of Aleppo, Crescent, Findlay, Kilbuck, Moon, and Neville; and the BOROUGHS of Avalon, Ben Avon, Coraopolis, Edgeworth, Emsworth, Glenfield, Haysville, Osborne, and Sewickley.  
TOTAL POPULATION: 58,483 |
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| Dist.    | 56     | **ALLEGHENY COUNTY**  
TOWNSHIPS of Reserve and Ross; and the BOROUGHS of Bellevue and West View.  
TOTAL POPULATION: 57,184 |
| Dist.    | 57     | **ALLEGHENY COUNTY**  
TOWNSHIPS of Hampton, Districts 2-6, and 9; Leet; Marshall; McCandless; Ohio; and Pine; and the BOROUGHS of Bell Acres, Ben Avon Heights, Bradford Woods, Franklin, Leetsdale, Sewickley Heights, and Sewickley Hills.  
TOTAL POPULATION: 58,865 |
| Dist.    | 58     | **ALLEGHENY COUNTY**  
TOWNSHIPS of Hampton, Districts 1, 7 and 8; Indiana; and Shaler; and the BOROUGHS of Etna, Millvale, and Sharpsburg.  
TOTAL POPULATION: 57,530 |
| Dist.    | 59     | **ALLEGHENY COUNTY**  
CITY of Pittsburgh, Ward 13; and the BOROUGHS of Churchill, Edgewood, Forest Hills, and Wilkinsburg.  
TOTAL POPULATION: 59,356 |
| Dist.    | 60     | **ALLEGHENY COUNTY**  
CITY of Pittsburgh, Wards 14 and 15.  
TOTAL POPULATION: 58,000 |
| Dist.    | 61     | **ALLEGHENY COUNTY**  
CITY of Pittsburgh, Wards 1, 2, 16-18, 30, and 31; and the BOROUGH of Mt. Oliver.  
TOTAL POPULATION: 58,385 |
| Dist.    | 62     | **ALLEGHENY COUNTY**  
CITY of Pittsburgh, Wards 19, 29, and 32.  
TOTAL POPULATION: 57,828 |
| Dist.    | 63     | **ALLEGHENY COUNTY**  
CITY of Pittsburgh, Wards 20; 21; 26, Divisions 1, 2, and 16; and Wards 27 and 28.  
TOTAL POPULATION: 58,974 |
| Dist.    | 64     | **ALLEGHENY COUNTY**  
CITY of Pittsburgh, Wards 6; 8, Divisions 1-3, 6, 7, and 10; Wards 9; 22-25; and 26, Divisions 3-11, 13-15, and 17.  
TOTAL POPULATION: 59,371 |
| Dist.    | 65     | **ALLEGHENY COUNTY**  
CITY of Pittsburgh, Wards 3-5; 7 and 8, Divisions 4 and 5.  
TOTAL POPULATION: 58,304 |
| Dist.    | 66     | **ALLEGHENY COUNTY**  
CITY of Pittsburgh, Wards 8, Divisions 8, 9, 11-14; Wards 10; 11; and 12.  
TOTAL POPULATION: 58,831 |
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| Dist.    | 67     | SOMERSET COUNTY  
TOWNSHIPS of Jefferson, Jenner, Lincoln, Quemahoning, and Somerset; and the BOROUGHS of Boswell, Hooversville, Jennerstown, Somerset, and Stoystown.  
POPULATION: 28,009 |
| Dist.    | 68     | WESTMORELAND COUNTY  
TOWNSHIPS of Donegal, Cook, Ligonier, and Mt. Pleasant; and the BOROUGHS of Donegal, Ligonier, and Mt. Pleasant.  
POPULATION: 31,357 |
| Dist.    | 69     | TOTAL OF DISTRICT: 59,366 |
| Dist.    | 68     | CAMBRIA COUNTY  
TOWNSHIPS of Adams, Richland, and Stony Creek; and the BOROUGHS of Ferndale, Geistown, Lorain, Scalp Level, and South Fork.  
POPULATION: 33,945 |
| Dist.    | 69     | SOMERSET COUNTY  
TOWNSHIPS of Conemaugh, Ogle, Paint, and Shade; and the BOROUGHS of Benson, Central City, Paint, and Windber.  
POPULATION: 24,820 |
| Dist.    | 70     | TOTAL OF DISTRICT: 58,765 |
| Dist.    | 69     | BEDFORD COUNTY  
POPULATION: 46,782 |
| Dist.    | 70     | FULTON COUNTY  
POPULATION: 12,842 |
| Dist.    | 71     | TOTAL OF DISTRICT: 59,624 |
| Dist.    | 70     | CAMBRIA COUNTY  
CITY of Johnstown; TOWNSHIPS of Lower Yoder, Upper Yoder, and West Taylor; and the BOROUGHS of Brownstown, Dale, Southmont, and Westmont.  
TOTAL POPULATION: 58,589 |
| Dist.    | 71     | CAMBRIA COUNTY  
TOWNSHIPS of Allegheny, Cambria, Conemaugh, Croyle, Cresson, East Taylor, Gallitzin, Jackson, Middle Taylor, Munster, Portage, Summerhill, and Washington; and the BOROUGHS of Cassandra, Cresson, Daisytown, East Conemaugh, Ebensburg, Ehrenfeld, Franklin, Lilly, Loretto, Nany Glo, Portage, Sankertown, Summerhill, and Wilmore.  
TOTAL POPULATION: 58,824 |
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| Dist.    | 72     | **BLAIR COUNTY**  
TOWNSHIPS of Allegheny; Blair; Frankstown; Freedom; Greenfield; Huston; Juniata; Logan, Districts 1, 2, 4-7; North Woodbury, Taylor, and Woodbury; and the BOROUGHs of Duncansville, Hollidaysburg, Martinsburg, Newry, Roaring Springs, and Tunnell Hill.  
POPULATION: 55,863 |
| Dist.    | 73     | **CAMBRIA COUNTY**  
BOROUGHs of Gallitzin and Tunnell Hill.  
POPULATION: 2,674  
TOTAL OF DISTRICT: 58,537 |
| Dist.    | 74     | **BLAIR COUNTY**  
CITY of Altoona; and the TOWNSHIP of Logan, District 3.  
TOTAL POPULATION: 58,582 |
|          |        | **BLAIR COUNTY**  
TOWNSHIPS of Antis, Catherine, Snyder, and Tyrone; and the BOROUGHs of Bellwood, Tyrone, and Williamsburg.  
POPULATION: 22,176 |
|          |        | **CENTRE COUNTY**  
TOWNSHIPS of Boggs, Burnside, Curtin, Half Moon, Howard, Huston, Liberty, Marion, Patton, Rush, Snow Shoe, Taylor, Union, and Worth; and the BOROUGHs of Howard, Milesburg, Philipsburg, Port Matilda, Snow Shoe, South Philipsburg, and Unionville.  
POPULATION 31,547 |
|          |        | **CLEARFIELD COUNTY**  
TOWNSHIP of Cooper.  
POPULATION: 2,819 |
|          |        | **HUNTINGDON COUNTY**  
TOWNSHIPS of Franklin, Morris, Spruce Creek, and Warriors Mark; and the BOROUGH of Birmingham.  
POPULATION: 2,670  
TOTAL OF DISTRICT: 59,212 |

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| Dist.    | 75     | CUMBERLAND COUNTY  
BOROUGH of Shippensburg.  
POPULATION: 4,376 |
|          |        | FRANKLIN COUNTY  
TOWNSHIPS of Fannett; Greene, District 3; Letterkenny;  
Lurgan; and Southampton; and the BOROUGHS of Orrstown  
and Shippensburg.  
POPULATION: 15,592 |
|          |        | HUNTINGDON COUNTY  
TOWNSHIPS of Brady, Carbon, Cass, Clay, Cromwell, Dublin,  
Hopewell, Juniata, Lincoln, Logan, Oneida, Penn, Porter,  
Shirley, Smithfield, Springfield, Tell, Todd, Union, West  
and Wood; and the BOROUGHS of Alexandria, Broad Top City,  
Cassville, Coalmont, Dudley, Huntingdon, Mapleton,  
Marklesburg, Mill Creek, Mt. Union, Orbisonia, Petersburg,  
Rockhill, Saltillo, Shade Gap, Shirlleysburg, and Three  
Springs; and the TOWNSHIPS of Henderson, Walker, Barree,  
Jackson and Miller.  
POPULATION: 39,583  
TOTAL OF DISTRICT: 59,551 |
| Dist.    | 76     | FRANKLIN COUNTY  
TOWNSHIPS of Greene, Districts 1 and 2; Guilford; Hamilton;  
Metal, Montgomery; Peters; St. Thomas; and Warren; and the  
BOROUGHS of Chambersburg and Mercersburg.  
TOTAL POPULATION: 58,326 |
| Dist.    | 77     | ADAMS COUNTY  
TOWNSHIPS of Cumberland, Freedom, Hamiltonban, Highland,  
and Liberty; and the BOROUGHS of Carroll Valley, Fairfield,  
and Gettysburg.  
POPULATION: 17,264 |
|          |        | FRANKLIN COUNTY  
TOWNSHIPS of Antrim, Quincy, and Washington; and the  
BOROUGHS of Greencastle, Mont Alto, and Waynesboro.  
POPULATION: 39,731  
TOTAL OF DISTRICT: 56,995 |
| Dist.    | 78     | ADAMS COUNTY  
TOWNSHIPS of Berwick, Butler, Conewago, Germany, Franklin,  
Hamilton, Huntington, Latimore, Menalten, Mt. Joy, Mt.  
Pleasant, Oxford, Reading, Straban, Tyrone, and Union; and  
the BOROUGHS of Abbottstown, Arendtsville, Bendersville,  
Biglerville, Bonneauville, East Berlin, Littlestown,  
McSherrystown, New Oxford, and York Springs.  
POPULATION: 51,028  
CUMBERLAND COUNTY  
TOWNSHIPS of Shippensburg and Southampton.  
POPULATION: 7,140  
TOTAL OF DISTRICT: 58,168 |
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| Dist.    | 79     | **CUMBERLAND COUNTY**
TOWNSHIPS of Dickinson, Lower Frankfort, Middlesex, Monroe, North Middleton, Silver Spring, and South Middleton; and the BOROUGHS of Carlisle and Mt. Holly Springs. TOTAL POPULATION: 59,392 |
| Dist.    | 80     | **CUMBERLAND COUNTY**
TOWNSHIPS of East Pennsboro, Hampden, and Upper Allen; and the BOROUGHS of Mechanicsburg, Shiremanstown, and West Fairview. POPULATION: 53,768 |
| Dist.    | 81     | **PERRY COUNTY**
TOWNSHIP of Rye; and the BOROUGH of Marysville. POPULATION: 4,183 |
|          |        | TOTAL OF DISTRICT: 57,951 |
| Dist.    |        | **CUMBERLAND COUNTY**
TOWNSHIPS of Cooke, Hopewell, Lower Mifflin, North Newton, Penn, South Newton, Upper Frankford, Upper Mifflin, and West Pennsboro; and the BOROUGHS of Newburg and Newville. POPULATION: 15,861 |
|          |        | **JUNIATA COUNTY**
TOWNSHIPS of Beale, Delaware, Lack, Milford, Spruce Hill, Turbett, Tuscarora, and Walker; and the BOROUGHS of Mifflin, Port Royal, and Thompstown. POPULATION: 10,669 |
|          |        | **PERRY COUNTY**
TOWNSHIPS of Buffalo, Carroll, Centre, Greenwood, Howe, Jackson, Juniata, Liverpool, Miller, Northeast Madison, Oliver, Penn, Saville, Southwest Madison, Spring, Toboyne, Tuscarora, Tyrone, Watts, Wheatfield; and the BOROUGHS of Blain, Bloomfield, Duncannon, Landisburg, Liverpool, Millerstown, New Buffalo, and Newport. POPULATION: 31,535 |
|          |        | TOTAL OF DISTRICT: 58,065 |