people elect officials to a governmental body, the districts from which the officials are elected must be equitably apportioned.

The 15th Amendment prohibits the federal government as well as the states from denying or abridging a citizen's right to vote because of race or color. The constitutional guarantees of the 14th and 15th Amendments have been extended to instances in which reapportionment plans may be racially discriminatory.

The U. S. Voting Rights Act

Congress passed the Voting Rights Act in 1965. The Supreme Court observed that the act was in response to the "common practice of some jurisdictions staying one step ahead of the federal courts by passing new discriminatory voting laws as soon as old ones had been struck down." (South Carolina v. Katzenbach, 1966)

Federal courts have upheld the act many times as a legal means of enforcing 14th and 15th Amendment rights.

Louisiana is one of nine states in which the preclearance provisions of the act apply statewide; certain jurisdictions in 13 other states are also subject to its provisions.

Under Section 5 of the act, all election changes, including reapportionment, must be cleared by the U. S. attorney general or the District Court of the District of Columbia before they can become effective. The state or a local government has the burden of proving its reapportionment plan follows the law, that is, it "does not have the purpose and will not have the effect of denying or abridging the right to vote on account of race or color."

Congressional Reapportionment Laws

Federal statutes require that U. S. representatives be elected from single-member districts and assigns to the states responsibility for determining boundaries of those districts. Louisiana law requires that congressional districts remain unchanged until reapportioned by the Legislature.

Neither federal nor state law fixes a deadline for reapportioning congressional districts after a decennial census. However, if districts are not reapportioned by the time candidates qualify for the congressional election, any citizen can file for an injunction with a court of legal jurisdiction to stop the election.

Public Service Districts

The state constitution provides that public service commissioners be elected from single-member districts as determined by law, and a 1975 act established the composition of the districts.

Current state law is silent as to who has the responsibility for reapportioning the districts after a decennial census, and the deadline for doing so. A 1972 law, later repealed, required the Legislature to reapportion these districts at the first regular or special session after publication of the 1980 federal census.

Since the constitution made the Legislature responsible for designating the original five districts, it might be assumed that the Legislature has continuing responsibility for reapportioning the districts after each decennial census.

Legislative Districts

The Louisiana constitution contains specific provisions regarding legislative reapportionment. Article III, Section 1 requires single-member districts for both houses. Article III, Section 6 makes the Legislature responsible for reapportioning itself, with the "representation in each house as equally as practicable on the basis of population shown by the census." If the Legislature fails to reapportion itself, then the state supreme court, on petition of any voter, is ordered to do so.

The state constitution also sets the deadline for reapportioning legislative districts: "by the end of the year following the year in which the population of this state is reported to the president of the United States." December 31, 1981 is the present deadline for legislative reapportionment.

Parish Governments

State law requires parish governing authorities which elect all or some of their members from districts to examine their apportionment plans "within six months after the official release of every decennial census" to determine if there are any substantial population variances. After this examination, the governing authorities are to adopt an ordinance declaring the apportionment equitable or if not, provide for a new plan.

Interpretations of "official release" of the census can vary. The president received the 1980 census on December 31, 1980, but the state did not receive the final official counts until March 17, 1981.

The law is not specific as to when a parish governing authority must adopt a reapportionment plan if it judges its present apportionment inequitable. A parish governing authority could meet the legal requirement of providing for a new plan by appointing a study committee. There is no specific deadline for adopting a new plan.

If a new apportionment is adopted, it is to become effective at the end of the incumbents' term.

School Boards

State law provides for reapportioning local school boards. The boards are required to "reapportion themselves so that each member . . . represents as nearly the same number of constituents as is possible as required by recent decisions of the United States Supreme Court."

Members of a few school boards are elected from districts as well as at-large. A state attorney general's opinion (June 1, 1981) said that school boards may elect a combination of at-large and district members. A strict interpretation of the law would not allow such a combination since at-large members represent more people than members elected from districts.

State law also requires census data to be used to reapportion school board districts, and sets the deadline for reapportioning prior to the 1982 congressional elections.

Municipalities

Some municipalities elect members of their governing bodies at large, while other plans of government provide for election from districts.

Act 855 of 1981 requires municipal governing authorities with two or more election districts to examine their apportionment plan "within one year after the official release of each
decennial census." They must adopt an ordinance declaring their plan equitable, or provide for a new plan which is to be effective at the end of the term of incumbents. Municipalities with home rule charters are exempt, but most home rule charters contain reapportionment provisions.

The new municipal reapportionment law is patterned after the law covering parish bodies—and also lacks a specific deadline to reapportion.

**JUDICIAL DECISIONS**

The courts play an important role in interpreting laws and guaranteeing that they are enforced. Court decisions on reapportionment, primarily those by the U. S. Supreme Court, have brought about dramatic changes in representative government during the last two decades.

This report discusses a few of the major federal court decisions on reapportionment which enunciate basic criteria governments should be aware of as they undertake reapportionments. Legal citations for these federal court decisions appear in Appendix E.

Discerning the meaning and application of a court decision is not always easy, and even constitutional scholars do not always agree. One reason is the courts have cautioned that their rulings on reapportionment are made case by case on particular and perhaps unique circumstances. The National Conference of State Legislatures, in its June 1980 report, *Reapportionment: Law and Technology*, noted that problems arise in trying to draw firm or clear conclusions when the U. S. Supreme Court itself is frequently divided, not only over many of the issues, but over the meaning and consequences of its previous decisions. As the Court decides redistricting cases based upon 1980 census figures, new criteria may emerge, and the impact of past court decisions may in fact be minimized.

Most decisions discussed in this report apply to reapportionment plans drawn by state legislatures or other governmental bodies. Court-ordered plans must meet higher standards of population equality and are not reviewed under provisions of the Voting Rights Act. Also, a 1976 Supreme Court decision (East Carroll Parish School Board v. Marshall) said whenever the courts draw reapportionment plans, "single member districts are to be preferred absent unusual circumstances." This has been reaffirmed in other court decisions.

**Authority of the Federal Courts**

Until 1962, the U. S. Supreme Court had maintained reapportionment was a political issue not subject to court challenge. In the 1962 landmark decision, *Baker v. Carr*, the court reversed its prior decisions, citing Article III, Section 2 of the U.S. Constitution as its authority to review all laws of the United States. Subsequent decisions have extended the courts' jurisdiction to reapportionment of congressional districts, state legislatures and local governments.

Most federal court cases fall into one of two broad categories: (1) equal representation, "one man, one vote," and (2) gerrymandering for racial or political purposes.

**The Equal Representation Standard**

Two years after the Supreme Court decided federal courts had jurisdiction in apportionment cases, the one-man, one-vote rule was established in *Wesberry v. Sanders* (1964). In that case, the court ruled the constitutional prescription for election of members to the United States House of Representatives "means that as nearly as is practicable one man's vote in a congressional election is to be worth as much as another's." The court further stated the constitution's objective was to make "equal representation for equal numbers of people the fundamental goal . . . ." The court's decision was based on the U.S. Constitution, (Article I, Section 2), which provides that United States representatives be chosen "by the People of the several States."

Later that year the court extended the one-man, one-vote mandate to state legislatures in *Reynolds v. Sims*. The court held that "as a basic constitutional standard, the Equal Protection Clause requires that seats in both houses of a bicameral state legislature must be apportioned on a population basis."

The Supreme Court has established the following requirements for state legislative reapportionment on the basis of the *Reynolds* decision and others:

1. A state must make an honest and good faith effort to construct districts in both houses of its legislature as nearly of equal population as is practicable.

The *Reynolds* decision acknowledged that "mathematical exactness or precision is hardly a workable requirement" since it is impossible to arrange legislative districts with identical numbers of residents, citizens or voters.

The courts have not specified what degree of mathematical precision they require, or how much deviation will be tolerated. "...what is marginally permissible in one state may be unsatisfactory in another, depending on the particular circumstances of the case," the Supreme Court said in the *Reynolds* decision.

2. Population is, of necessity, the starting point and the controlling criterion for judging legislative apportionment controversies.

3. Some deviations from a strict equal population standard are constitutionally permissible if they are based on legitimate considerations incident to effecting a "rational state policy."

4. The proper judicial approach is to determine whether, under the particular circumstances involved, there was a faithful adherence to a plan based on representation of population, with minor deviations occurring only in recognized factors that are free from "any taint of arbitrariness or discrimination."

**Congressional and Legislative Reapportionment Differentiated**

The *Reynolds* decision, rendered in 1964, indicated "...some distinctions may well be made between congressional and state legislative representation."

Later decisions seem to support this differentiation, with congressional redistricting requiring a higher degree of mathematical precision than legislative reapportionment.

A 1969 case, *Kirkpatrick v. Preisler*, ruled unconstitutional a Missouri congressional redistricting plan with deviations ranging from +3.1% to -2.8%.
The court rejected Missouri's argument that the low deviations were minimal and asserted there were no fixed numerical or percentage population variances small enough to be considered minimal and satisfy without question the "as nearly as practicable standard." To consider a certain range of variances minimal would encourage legislators to strive for that range rather than equality, the court noted, and observed "Clearly the population variances among the Missouri congressional districts were not unavoidable."

A Texas congressional reapportionment case (White v. Weiser, 1973) with deviations ranging from +2.4% to -1.7% was also rejected by the court. This decision noted that "congressional districts are not so intertwined and freighted with strictly local interests as are state legislative districts," and are comparatively larger so that each point of deviation concerns more people.

In Mahan v. Howell (1973), the court stated, "whereas population has been the sole criterion of congressional redistricting under Article I, Section 2 (of the U.S. Constitution), broader latitude has been afforded the States under the Equal Protection Clause of the 14th Amendment. This is not to say that any plan with less than a 10% overall range is safe from successful challenge; it merely establishes that the plaintiff has the burden of proof. The court said in White that it could not "glean out an equal protection violation from the fact that two legislative districts in Texas differ from one another by as much as 9.9%..." and in Gaffney it indicated that a showing by the plaintiff that an alternative plan with a lower overall range could be devised is not, in and of itself, sufficient to require a federal court to invalidate a plan adopted by a state legislature.

If a state adopted a plan with a greater than 10% overall range and the plan were challenged in federal court, the state would probably have the burden of proving the overall range was necessary to implement a rational state policy and also that the plan did not dilute the voting strength of a minority group.

Tolerable Limit For Legislative Reapportionment?

There has been only one case (Mahan v. Howell, 1973) in which the Supreme Court upheld a legislative redistricting plan in which the overall range exceeded 10% based on a "rational state policy." The case involved reapportioning the Virginia legislature which resulted in a 16.4% overall range. A federal district court had condemned the plan because the state "had proved no governmental necessity for strictly adhering to political subdivision lines." The Supreme Court upheld the plan on the basis that it was a "rational state policy" to adhere to lines of political subdivisions so the legislature could implement constitutional programs for localities. The court also noted the reapportionment did not discriminate against any racial or political group. It concluded that while the 16.4% deviation "may well approach tolerable limits, we do not believe it exceeds them." Some interpret this decision to mean that a 16.4% overall range, based on a rational state plan and free of discriminatory aspects, is the limit which the court will tolerate in legislative reapportionment plans. Others feel the decision does not set a precedent for future cases since the circumstances were unique.

Local Reapportionment

A 1968 Supreme Court case (Avery v. Midland County) extended the one-man, one-vote principle to local governments.

In a 1975 decision (Abate v. Mundt), the court inferred the smaller the population of a jurisdiction to be reapportioned, the greater the degree of deviation it might tolerate. This suggests local governments may not be required to adhere as closely to population equality as would statewide reapportionment plans. Local governments are not required to use single-member districts exclusively and, in fact, some local governments in Louisiana use a combination of at-large and district representatives. The Supreme Court has ruled that multimember and a combination of single and multimember districts are not unconstitutional per se. However, in a 1965 case (Fortson v. Dorsey), the court warned that, whether intentional or not, in certain circumstances multimember districts could minimize or cancel out the voting strength of racial or political groups.

Most cases on multimember districts deal with racial discrimination or diluting minority voting strength. The plaintiff must prove the multimember districts were not designed to discriminate.

The courts have applied an "access to the political process test" in assessing whether multimember districts dilute votes of racial or political groups. In a 1971 case (Whitcomb v. Chavis), the Supreme Court concluded that not every racial or political group has a constitutional right to be represented. The question is whether residents have "equal opportunity to participate in and influence the selection of candidates and legislators," not whether they are successful at the polls.

Gerrymandering And Minority Representation

Gerrymandering received its name in 1812 when Massachusetts Governor Eldridge Gerry's Democratic Party drew a peculiarly shaped district for political benefit that had the appearance of a salamander; hence the term "gerrymander."

The Supreme Court defined gerrymandering as "the deliberate and arbitrary distortion of district boundaries and populations for partisan or personal political purposes." (Kirkpatrick v. Preisler, 1969)

Joseph C. Markowitz described gerrymandering in an article appearing
Three types of gerrymander may give rise to qualitative districting challenges: (1) splitting a hostile voting group among several districts so that it constitutes a minority in each, (2) concentrating a voting bloc into one district of nearly unanimous opinion, and (3) creating multimember districts or providing for at-large elections of representatives. Each of these forms of gerrymandering has the effect of diluting the political power of a minority voting group.

In assessing minority representation, the courts have focused “not on population-based apportionment but on the quality of representation.” (Whitcomb v. Chavis, 1971)

Most minority representation cases cite questionable and recurring characteristics—district boundaries that form strange configurations, and gerrymandering a minority group into a single district or among several districts so it loses its influence and access to the political process. In White v. Regester, the Supreme Court held that a plaintiff must show the political processes leading to nomination and election were not open to equal opportunity and participation by the group in question.

Use of Racial Quotas

In United Jewish Organizations of Williamsburgh v. Carey (1977), the Supreme Court dismissed a complaint of white voters that the legislative reapportionment used racial criteria and quotas, thus violating rights guaranteed by the 14th and 15th Amendments. The court rejected this argument, concluding “the Constitution does not prevent a State subject to the Voting Rights Act from deliberately creating or preserving black majorities in particular districts in order to insure that its reapportionment plan complies with Section 5” of the act. The court said “neither the Fourteenth nor the Fifteenth Amendment mandates any per se rule against using racial factors in districting and apportionment.” Permissible use of racial criteria is not confined to eliminating effects of past discriminatory apportionment, according to the court, and it upheld use of racial quotas in establishing a certain number of black majority districts in proportion to their population.

The Burden of Proof

In a 1980 decision (City of Mobile v. Bolden), the Supreme Court ruled that when a form of government (in this instance, the commission plan in which at-large commissioners are elected) is challenged on the basis of denial of 14th and 15th Amendment rights, the plaintiff has the burden of proving the motive was racial discrimination. The plurality opinion said “The Court’s more recent decisions confirm the principle that racially discriminatory motivation is a necessary ingredient of a Fifteenth Amendment violation” and noted that as the 14th Amendment is concerned, a plaintiff must prove that the disputed plan was intended to further racial discrimination.

Under provisions of the Voting Rights Act, the burden of proof rests with the state or political subdivision involved—not with those who may be discriminated against.

The U. S. Supreme Court held in Georgia v. U. S. (1973) that the U. S. attorney general was not required to find discrimination to disapprove a state’s reapportionment plan under preclearance provisions of the act. The court ruled if the U. S. attorney general was “unable to conclude that the plan does not have a discriminatory racial effect on voting,” this was sufficient to prevent the plan from being put into effect.

In a 1980 case (City of Rome v. United States), the Supreme Court said Congress’s intent in enacting the Voting Rights Act was that a voting practice not be approved unless both the purpose and effect of discrimination were absent.

The “Non-retrogression Standard” of the Voting Rights Act

Reapportionment of the New Orleans City Council lead to a Supreme Court decision on racial criteria applicable under the Voting Rights Act. (Beer v. United States, 1976)

The new New Orleans redistricting plan increased from one to two the number of single-member districts with a majority black population, and resulted in one district with a black voter majority where previously there had been none. The District Court of the District of Columbia rejected the plan as abridging the voting rights of blacks because even though the number of black districts had been increased, blacks were still underrepresented based on their population and voter registration. The lower court also criticized the city for retaining two at-large seats.

The Supreme Court reversed the district court, maintaining the purpose of the Voting Rights Act has always been “to insure that no voting-procedure changes would be made that would lead to a retrogression in the position of racial minorities with respect to their effective exercise of the electoral franchise,” and noted that at least one black could be elected whereas none had been elected before. The court observed that the voting rights of blacks had been enhanced. Insofar as the at-large seats, the court ruled that the plan could not be rejected because it continued at-large seats which existed before the Voting Rights Act was enacted; this was not an election change subject to review.

Black Retrogression In Statewide Reapportionment

Some have wondered if existing black districts must be retained in a statewide reapportionment plan if an equal or greater number of new black districts are created in other areas of the state. One Supreme Court decision (Connor v. Finch, 1977) may give some insight into this question. In this case, the court said “districts that disfavor a minority in one part of the state may be counterbalanced by favorable districts elsewhere . . .”

Gerrymandering For Incumbents

Incumbent legislators who must re-apportion their districts may tend to favor themselves. The Supreme Court in a 1966 decision (Burns v. Richardson) noted that legislative districting plans drawn to minimize “the number of election contests between present incumbents does not in and of itself establish invidiousness.” A 1973 decision (White v. Weiser) reaffirmed this ruling.

However, a 1971 case (Ely v. Klahr) cautioned that any special consideration given incumbents in determining
boundaries of legislative districts could make it difficult to justify those boundaries in subsequent litigation.

Gerrymandering For Political Parties

Gerrymandering is also used to strengthen a political party. The Supreme Court accepted a Connecticut reapportionment plan devised by a bipartisan commission to create safe Democratic and Republican districts as well as districts which either party might carry. The plan was based on party election results from three preceding statewide elections. The court concluded: "neither we nor the district courts have a constitutional warrant to invalidate a state plan, otherwise within tolerable population limits, because it undertakes, not to minimize or eliminate the political strength of any group or party, but to recognize it and, through districting, provide a rough sort of proportional representation in the legislative halls of the State." (Gaffney v. Cummings, 1973)

In the Gaffney case, the plan recognized the existing party situation and did not try to change it. The court warned that even if districts are equal or substantially equal in population, they still may violate equal protection guarantees. How elections are arranged or powers allocated to achieve political ends is subject to judicial scrutiny.

COMMENTS AND RECOMMENDATIONS

A January 1971 PAR Analysis observed that:

Reapportionment in 1971 will result in many changes in election districts at the state and local level, but a relatively easy period of transition could result if elected officials and the public accept the fact that reapportionment must be done in good faith.

Reapportionment did result in significant changes, but not all efforts were "done in good faith." The federal courts rejected plans which did not adhere to the constitutional guarantee of equality of representation, and the courts as well as the U. S. Justice Department rejected plans which discriminated against racial minorities.

Reapportionment of the Louisiana Legislature is a case in point. The Legislature's plan failed as a good faith effort; it was rejected by the justice department as well as by the federal courts. As a result, the Legislature lost its responsibility to reapportion itself, and a federal judge named PAR as special master to draw a plan that would meet constitutional requirements enunciated by the courts. Now that 1980 census data is available, another round of reapportioning state and local elective bodies must take place. Those charged with the responsibility to reapportion—legislators and governing bodies of school boards, parishes and municipalities—face a difficult but most important task.

A good faith effort again will be required to assure that people are represented equally and fairly. Neither the federal courts nor the U. S. Justice Department have issued a specific set of instructions to guarantee approval of reapportionment plans. Still, any reapportionment plan will be vulnerable to legal challenge and possible rejection if it:

- discriminates against racial minorities by diluting or diminishing their votes;
- gerrymanders to benefit incumbents unduly, or
- favors one political party or group.

Recommendations

1. Citizens should become informed about reapportionment of governmental bodies that will affect them, and participate through public hearings on proposed plans.

2. Legislators and local officials charged with devising reapportionment plans should adhere as closely as possible to court criteria and guidelines, and strive for even higher standards which future court decisions may require. A good faith effort and a rational plan are essential.

3. Louisiana citizens should not have to go to court to be sure that reapportionment is accomplished in a timely and fair manner. State law should be changed as follows:

- Deadlines should be established for reapportioning all public bodies with election districts. The state constitution sets a deadline for reapportioning the Legislature—one year after the president of the United States receives the decennial census. State law requires that local school boards reapportion in time for elections held the second year after a decennial census; currently, this would be before the 1982 congressional elections. However, state law is silent on when reapportionment plans must be adopted for congressional, public service, parish and municipal districts.

The constitutional deadline for accomplishing legislative reapportionment is reasonable, and should apply uniformly for all public bodies. New apportionments should become effective for the next ensuing election of members of each public body.

- The Legislature should be assigned specific responsibility to reapportion public service districts.

- The law concerning school board reapportionment should be clarified as to whether combinations of at-large and district elections are allowed, or whether single-member districts should be used exclusively.
### APPENDIX A


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<td>+0.1%</td>
<td>+14.87%</td>
</tr>
<tr>
<td>31</td>
<td>Vernon (part)</td>
<td>35,890</td>
<td>40,426</td>
<td>+3.4%</td>
<td>-1.53%</td>
</tr>
<tr>
<td>32</td>
<td>Allen, Beauregard,</td>
<td>35,641</td>
<td>41,877</td>
<td>+2.7%</td>
<td>+45.99%</td>
</tr>
<tr>
<td>33</td>
<td>Calcasieu (part)</td>
<td>34,021</td>
<td>41,237</td>
<td>-1.9%</td>
<td>+2.97%</td>
</tr>
<tr>
<td>34</td>
<td>Calcasieu (part)</td>
<td>34,149</td>
<td>37,627</td>
<td>-1.6%</td>
<td>-6.02%</td>
</tr>
<tr>
<td>35</td>
<td>Calcasieu (part)</td>
<td>35,458</td>
<td>32,247</td>
<td>+2.2%</td>
<td>-3.36%</td>
</tr>
<tr>
<td>36</td>
<td>Calcasieu (part)</td>
<td>35,778</td>
<td>46,926</td>
<td>+3.1%</td>
<td>+17.20%</td>
</tr>
<tr>
<td>37</td>
<td>Cameron</td>
<td>34,977</td>
<td>39,654</td>
<td>+0.8%</td>
<td>-0.96%</td>
</tr>
<tr>
<td>38</td>
<td>Calcasieu (part),</td>
<td>34,372</td>
<td>35,714</td>
<td>+1.2%</td>
<td>-10.80%</td>
</tr>
<tr>
<td>39</td>
<td>St. Landry (part)</td>
<td>33,730</td>
<td>38,333</td>
<td>-2.8%</td>
<td>-4.26%</td>
</tr>
</tbody>
</table>

#### District Description (Parish, Whole or Part)

- **Caddo (part)**
  - Lyon
- **Jackson, A. (part)**
- **Duo (part)**
- **Waddell (part)**
- **O'Neal (part)**
- **Sour (part)**
- **McFerren (part)**
- **Adley (part)**
- **Deen (part)**
- **Bolin (part)**
- **Weaver (part)**
- **Blythe (part)**
- **Fair (part)**
- **Ensminger (part)**
- **Walls (part)**
- **Dimos (part)**
- **Jones (part)**
- **Crosby (part)**
- **Thompson, F. (part)**
- **Williams (part)**
- **Atkins (part)**
- **Brady (part)**
- **Long (part)**
- **Woliver (part)**
- **Gunter (part)**
- **Lahonde (part)**
- **Dewitt (part)**
- **West (part)**
- **Morris (part)**
- **Cain (part)**
- **Andrepon (part)**
- **Hogan (part)**
- **Lowenthal (part)**
- **LeBlanc (part)**
- **Martin (part)**
- **Soileau (part)**
- **LaLonde (part)**