



**California Labor Federation**

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**RE: Proposed Redistricting Commission Regulations**

Dear Mr. Claypool and Ms. Brumley:

The California Labor Federation would like to make sure that working Californians have an equal opportunity to apply for the Citizens Redistricting Commission and to participate in the important redistricting process. We are writing to express concern that the Bureau's proposed regulations will make it difficult for working Californians to qualify for the Commission and consequently to participate in the redistricting process.

One of the main purposes of Proposition 11 was to put redistricting in the hands of a citizens commission that is open to all voters and reflects the diversity of the State. (Cal. Const., art. XXI, § 2(c)(1).) And although California is home to some of the wealthiest people in the country, they make up a very small percentage of the population. The overwhelming majority of Californians are working and middle-class people who care very much about the state and would like the opportunity to serve on the Citizens Redistricting Commission. The Bureau should therefore take all necessary steps to make sure working Californians are encouraged to apply for and are adequately represented on the Commission.

We are concerned, however, that several aspects of the proposed regulations are counter-productive to that goal. The Regulations (§ 60826(b).) that outline the type of skills relevant to serving on the Commission sound unnecessarily daunting and may dissuade many people from applying. Descriptions of skills include the ability to read and understand "dense and technical written materials, including . . . complicated statistical

information: and other descriptions of skills that give the impression that potential Commissioners need to have advanced degrees to participate.

The emphasis on quantitative skills also suggests that commissioners themselves will be responsible for all of the technical aspects of line-drawing, including running software and understanding and applying the algorithms and statistical models that underpin redistricting software. But in reality, commissioners will be overseeing the work of experts and need not have experience with statistics and sophisticated software. Moreover, line-drawing software, such as Maptitude, has become very user-friendly and one need not understand statistical and mathematical techniques to operate and understands the results from such software. Since the skills described in the Regulations are not necessary to adequately perform the Commissioner's duties, we recommend they be edited to not discourage the participation of people with all levels of technical skills.

We also recommend that the Bureau ensure that all regulations related to diversity specifically reference "economic status." The Bureau did that in section 60814, but in section 60805(a)(1) it used the term "level of income" presumably to identify "economic status." Level of income is not a term commonly used when discussing diversity may also discourage Californians who are currently unemployed and without income from applying. Given the unprecedented levels of unemployment in this state, the Bureau should avoid any confusion and revise section 60805(a)(1) to include "economic status."

We urge the Bureau of State Audits to consider these recommendations for changes to the Regulations. It is critical that the regulations do not inadvertently discourage any potential applicant and ensure the equal opportunity for participation of all Californians. Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Art Pulaski". The signature is fluid and cursive, with the first letters of "Art" and "Pulaski" being capitalized and prominent.

Art Pulaski  
Executive Secretary Treasurer

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