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**CALIFORNIA ASSOCIATION OF
CLERKS AND ELECTION OFFICIALS**

GAIL L. PELLERIN, PRESIDENT
Santa Cruz County Clerk
[Redacted], CA 95060

[Redacted] * Fax [Redacted] * Cell [Redacted]
E-Mail: [Redacted]
Website: [Redacted]

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June 7, 2011

RECEIVED JUN 10 2011

*Region 7:
Santa Cruz*

State of California
Citizens Redistricting Commission
901 P Street, Suite 154-A
Sacramento, CA 95814

RE: Adoption of Nested Districts in 2011 Redistricting Plan

Dear Commissioners:

The California Association of Clerks and Election Officials is a professional association with more than 700 members, representing County Election Officials and Clerks from all 58 California Counties. As elected and appointed local government officials responsible for the administration of elections and voter registration in the State of California, we recognize the complexity and importance of the work before your Commission.

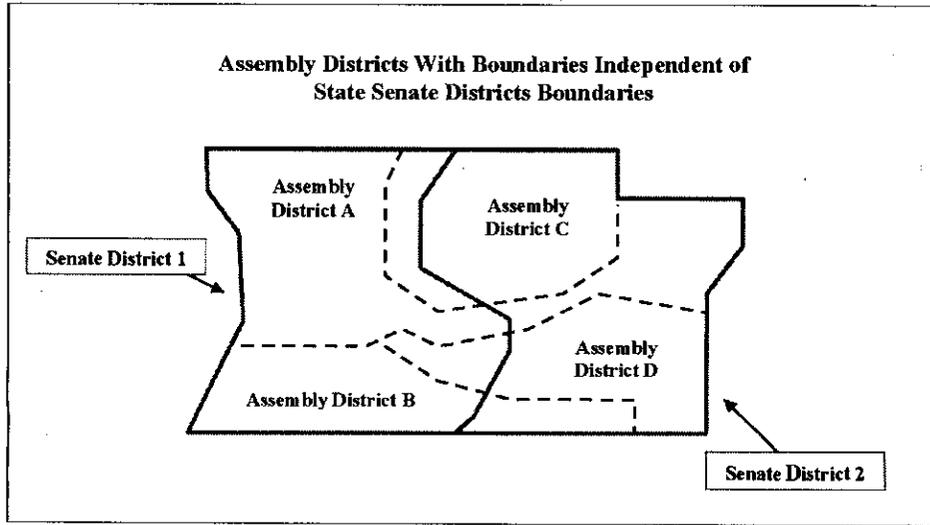
On behalf of the Association I am writing to express our strong encouragement for the Commission to maximize the number of nested legislative and Board of Equalization districts included in your 2011 redistricting plans. Proposition 11 adopted by the voters of California in 2008 is clear on its intent to nest State Senate and Assembly districts "to the extent practicable, and where it does not conflict with other criteria set forth." Where practicable, nested districts not only present more geographically compact and contiguous layering of district boundaries, they also provide for more efficient and manageable election administration that can result in cost avoidances for counties and clearer district boundaries for voters.

Non-nested districts present a number of challenges that significantly impact the administration of elections, often impacting the efficiency of the process and cost of the election. The following are critical impacts for you to consider:

Non-Nested districts result in increased district boundary lines

Defining State Senate and Assembly district boundaries independently results in a large increase in the number of boundary lines that must be implemented in the election management system. Instead of each State Senate district being split by one line into two Assembly districts, each State Senate district must be split by multiple lines in order to implement the boundaries of the non-nested State Assembly districts (Figure 3).

Figure 3

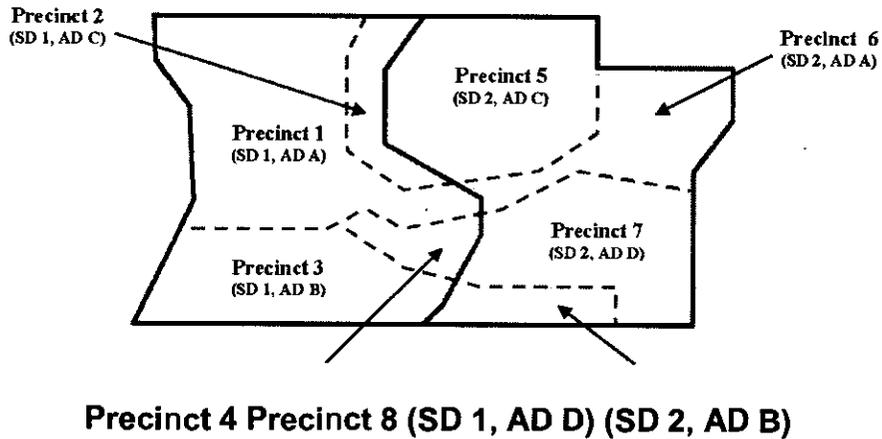


Non-nested districts will increase the number of precincts and election ballot groups resulting in increased election costs

A costly consequence of defining State Assembly districts independent from State Senate boundaries is the effect it has of increasing the number of precincts that must be managed in the election system, and the number of ballot groups that are formed for individual elections. Whereas, in a nested configuration we are only required to have four precincts, one for each State Assembly and State Senate district combination, in a non-nested configuration we would have to create eight precincts (Figure 4). This is because California Elections Code 12222 prohibits precinct boundaries from crossing major district boundaries, which includes State Senate and Assembly districts.

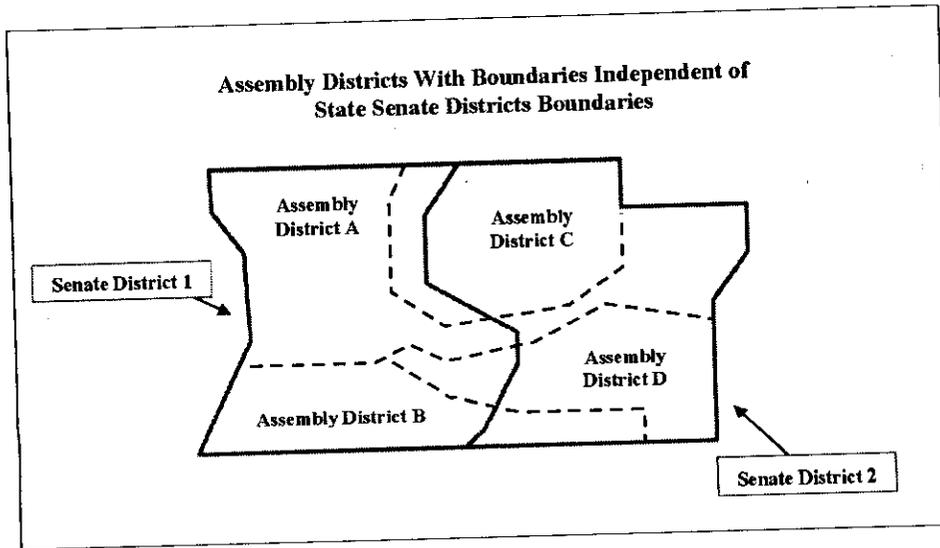
Figure 4

Increased Number of Precincts When Assembly Districts Are Not Nested Within State Senate Districts



Precinct 4 Precinct 8 (SD 1, AD D) (SD 2, AD B)

Figure 3

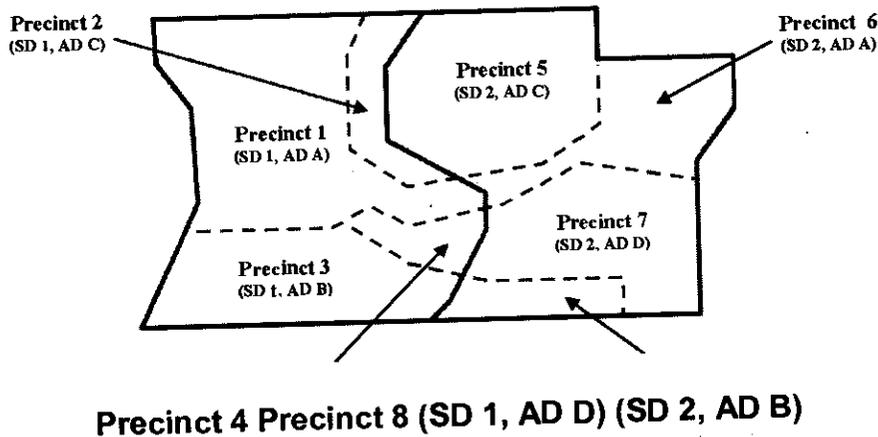


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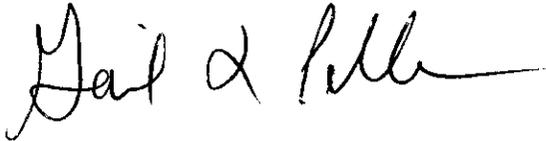
June 7, 2011

We ask that you give due consideration to the concerns outlined in this letter. The association understands the incredibly important and complex job of the Commission and commends you for your efforts. However, we ask that as you make every practicable effort to maximize every opportunity to nest districts per Sec. 2 (d) (6) of Article XXI of the California Constitution. Neglecting the opportunity to nest districts (where practicable) may have a significant impact on election costs over the next decade.

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tunity to nest districts per Sec. 2 (d)
to nest districts (where practicable)

Thank you for your attention. We look forward to the work of the commission. If you have any questions or require additional information please feel free to contact me at (831) 452-2419.

Sincerely,



Gail L. Pellerin, President
California Association of
Clerks and Election Officials

cc: CACEO Membership