TO: Citizens Redistricting Commission

FROM: Dr. Victor Rodriguez

DATE: May 31, 2011

RE: Impact of Advice by Counsel on Voting Rights of Californians

My name is Dr. Victor Rodriguez, I am a political sociologist and I study Latino demography in Orange County. I am a professor at California State University Long Beach. I am concerned that the legal directions to those who drew lines may guarantee a successful federal lawsuit under the Voting Rights Act.   It seems the directions you gave on May 27th and May 28th will harm the voting rights of Latinos as Michael Berman did 10 years ago. I believe that this should not be the legacy of California's first citizen's redistricting commission: dismantling of fifty years of progress advancing the voting rights of all Californians.

I am focusing my comments on the State Assembly plan though the impacts may be similar for Senate and Congress.   The state's Latino population has grown dramatically over the last 10 years, it seems your directions will have the following results:
"   Dismantle an existing Voting Rights Act seat first created by the California Supreme Court in 1991;
"   Dismantle the only new Latino Assembly seat created by the Legislature in 2001;
"   Create only one new Latino 50%+ CVAP Assembly district in 2011; and,
"   Create fewer Latino Section 2 Voting Rights Act seats than every statewide plan submitted by the public, including that by the conservative Institute for Jobs, Economy, and Education.

Faulty Directions from Legal Counsel

I believe your legal counsel gave you two pieces of faulty legal advice.   First, he relied almost exclusively on a 50% + CVAP standard to determine if a potential district qualified under Section 2 of the Voting Rights Act, arguing that the Ninth Circuit Court of Appeals requires use of CVAP.   It is true that case law in this circuit and others indicates that the appropriate measure is CVAP, but the methods used to measure CVAP must be accurate.   It cannot be disputed that the CVAP data is: 1) based on sampling data that has an inherent margin of error; 2) further adjusted to apply at the census block level, thereby introducing even more error; and 3) based on data that is an average of information collected from 2005-2009, which underestimates Latino voting power. The result is that plans based on your directions will likely add no Section 2 districts in Los Angeles county.

I believe the your counsel took an extraordinarily conservative view of what constitutes a cohesive minority group.   He ignored both community of interest testimony and the historical record, and instead relied solely on a personal subjective evaluation in making his

recommendations.

Orange County

Your counsel concluded that the Latino population in Orange County was not cohesive simply because it stretches across multiple cities. That ignores the historical processes of community formation of the last 60 years. Yet there was strong community of interest testimony that in Orange County neither Latino nor Asian communities follow city boundaries. For Asians, Little Saigon follows Bolsa Avenue through three cities. For Latinos, the historic uniting connector has been Harbor Boulevard from Santa Ana, through Garden Grove, and into Anaheim. As a resident of Orange County, I can personally attest that we are a single united, cohesive community. Our daily lives are shaped, not by city lines but by transportation, businesses which serve the community, not within but across city boundaries.

We can't and should not ignore the historical record. This Assembly district is not the result of a partisan gerrymander. Rather it is the creation of the courts in 1991. The Court wrote, "Districts 67, 68, 69, 70, 71, 72 and 73 are all Orange County districts. The first district constructed by us was District 69, in order to maximize the Latino population. It includes most of Santa Ana and the more Latino parts of Garden Grove and central Anaheim." (http://igs.berkeley.edu/library/research/quickhelp/policy/redistricting/reapp90-report/final-V-A.html#A4). This was not gerrymandering, it was maintaining a community of interest connected politically as it is socially.

Counsel also may have a conflict of interest with respect to this seat that they neglected to highlight: Gibson, Dunn co-counsel Dan Kolkey worked on redistricting for Pete Wilson in 1991, and at the time he opposed the creation of Assembly District 69.

Finally, I would note that the current district exceeds 50% Latino CVAP. As a result of your action, Latinos in Orange County will have a net reduction in the number of seats in which they make up a majority of the CVAP. This is certainly something that would raise concerns for any federal judge.

Based on your current directions, the draft will create only one new Assembly district where Latinos will make up 50% of the CVAP. This district is centered in the Pomona Valley. It currently has a Latino CVAP of 49.8%, and the only commission direction was to add the 26,000 people necessary to bring the district to population.

The Commission received three statewide plans. While some of these were submitted by groups that have been referred to as representing the "alphabet soup," one was submitted by the Institute for Jobs, Economy and Education. The Institute's plans were presented by a Republican political consultant and the former attorney for Governor Schwarzenegger, hardly bastions of the left.

All three Assembly plans kept Latinos in Orange County united and put Imperial County with Riverside County. All three presentations specifically referred to both of these districts as meeting Section 2 requirements. All three plans created more districts with 50% CVAP

statewide than those you have directed. Your directions would create only three Latino seats in Southern California outside of Los Angeles; yet no submitted plan created less than four, and the Institute plan almost created a fifth. Again, these facts would certainly raise concerns for any federal judge as they make sure that as section 2 states "A violation of subsection (a) of this section is established if, based on the totality of circumstances, it is shown that the political processes leading to nomination or election in the State or political subdivision are not equally open to participation by members of a class of citizens protected by subsection (a) of this section in that its member have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice. The extent to which members of a protected class have been elected to office in the State or political subdivision is one circumstance which may be considered."

Conclusion

Please re-examine whether the 50% CVAP standard is the appropriate measure for determining if districts meet the first test Gingles test and if its use may unintentionally lead to legally actionable packing in some areas.

I further urge the Commission to re-examine both the historical record and community of interest testimony in determining whether the Latinos in any given area form a cohesive group, specifically in Orange County. Part of the historical memory are efforts that led to the community not having the kind of clear voice that it is rightfully theirs.

Subject: Public Comment: 3 - Orange
From: Laurie Gooch <██████████████████████
Date: Wed, 1 Jun 2011 01:47:54 +0000
To: ████████████████████

From: Laurie Gooch <██████████████████████
Subject: Keep San Clemente In Orange County

Message Body:
San Clemente's nexus is Orange County not San Diego County or Riverside County. Keep
San Clemente in its geographic area with other south Orange County communities like
Dana Point, San Juan Capistrano and Laguna Beach. These cities share a common history
and though each is individually unique have common needs, challenges and lifestyles.

Thank you.

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This mail is sent via contact form on Citizens Redistricting Commission

Subject: Public Comment: 3 - Orange
From: mary carter <█████████████████████
Date: Tue, 31 May 2011 20:57:17 +0000
To: ████████████████████

From: mary carter <████████████████████
Subject: the new lines

Message Body:
How do you find the new map that just came out on the webb sight?

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This mail is sent via contact form on Citizens Redistricting Commission

Law Office of Gregory A. Diamond

███████████, Brea, CA 92821 ◊ ███████████
████████████ (voice/message) ◊ ███████████ (mobile)

May 30, 2011

Citizens Redistricting Commission
1130 K Street, Suite 101
Sacramento, CA 95814

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To the Commissioners,

My name is Greg Diamond. I am an attorney in Orange County and a former academic. I taught for four years as a Political Scientist at the University of Illinois, teaching American Politics and Voting Behavior. Before that, I received my Ph.D. in Social Psychology at the University of Michigan, training in its Survey Research Center. I testified twice before your commission, once in Long Beach (a long evening for all of us, which I'm afraid I made longer) and once on **May 6 in Santa Ana**. On both occasions, I presented you with individual copies of proposals. After I spoke in Santa Ana, I was asked to provide you additional information on the proposal I had created and to identify myself as **Speaker #71**. This packet contains that general information. After some initial comments I address Congressional, Assembly, and Senate District proposals relevant to Orange County and proposed Board of Equalization districts as well.

I regret not having been able to get you this material before I could devote a free holiday weekend to it, but that to me speaks to a potential flaw in the system: it appears to be much easier for organized groups, rather than individual citizen-freelancers like me, to take part in the process. The redistricting software seemed to test (and exceed) the limits of what I had previously thought to be a pretty decent home computer; eventually, I gave up on my plan to do at least Congressional districts for the entire state.[1] That was fortunate, because I discovered this weekend that my maps had been purged over the past few weeks – a dubious software feature. Unfortunately, I had found it impossible to coax the software's "Reports" function to print useful maps; I hope that others fared better with it. (I suspect that many of the groups that have provided you with maps have used other software to do so.)

I notice that many groups that reported maps on Friday do not seem to have followed the instructions. I will let you know what I've done. Why I favor one political party, I put any such affiliations aside. I have not looked up or considered a single incumbent residence, nor partisan registration differences, nor past voting behavior. I've considered only city and county lines, racial and ethnic affiliations, topography (including ease of freeway travel), income, and a few cultural factors such as proximity to the beach. That seems to be what the citizenry wanted when they voted to give you this authority; I wanted to satisfy myself that such fair and "blind" redistricting could really be done. I'm satisfied: it can be done.

Sincere good luck with the completion of your preliminary maps; I look forward to reading them.

   /s/

Greg Diamond

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[1] I recall finding state Congressional redistricting to be easiest when working upwards from Marin. Otherwise, creating one district entirely within San Francisco requires hopping over the water to combine Marin and Richmond, which serves no one's interests. I also found it helpful to separate Del Norte and Humboldt from Mendocino and work westward from there, then southward, creating a mountain district that would not impinge into the Central Valley.

CONTENTS

Preface: I have not included graphic maps. I have found them unnecessary (as well as difficult or impossible to produce using the web-based software on my home computer), because a simple list of communities suffices (and even imposes more discipline on the process.)

My philosophy is that (1) other things being roughly equal, boundaries that are most easily understood by laypersons are best and (2) "communities of interest" <u>can include cities and counties</u>, just as they include national boundaries. It should be enough for me to provide the names of cities and major unincorporated communities, and of those major streets and freeways that will serve as boundaries where I do not strictly follow city or county borders. In a mostly developed area such as Orange County, this will leave a trivial amount of territory that is not clearly within a given district, and the choices of where <u>specifically</u> to draw those final lines are somewhat arbitrary. (The choice of whether to follow a census tract boundary even at the cost of accepting a slightly more unequal population among districts I leave to you and your philosophies.)

I have noticed other reports celebrating that they have divided only 90, or 70, or however many cities, and commensurately fewer counties. This to me is a sign that people are setting their sights too low. In my Board of Equalization map, I divided <u>no</u> cities, and divided only three counties (Los Angeles County only because it was too large for one district.) My Congressional map for Orange County (almost 10% of the state) divides only four cities; my Assembly map divides only six; my Senate map divides only five – and most of these are because one freeway forms a better border than most city lines. I urge you to view those maps that divide cities too readily – as if people don't know or care about where they live – with suspicion. If one sets out intending to respect these well-known and accepted boundaries, it's simply not that hard to do.

███████████ / ██████████

Redistricting Orange County: Summary

Orange County's population of **3,009,217** in the 2010 census entitles it to representation equaling:

    4.28 Congressional Districts (of 702,905 apiece)
    6.46 Assembly Districts (of 465,675 apiece)
    3.23 State Senate Districts (of 931,350 apiece)

In each case, this proposal seeks to limit the county to one district "shared" with a neighboring county.

On "communities of interest"

My sense as an Orange County resident is that, for most areas, city and county borders do define default communities of interest. Orange County residents complain about their cities and their county being divided up into too many parts, which smacks to people of gerrymandering. So, in general, few communities of interest will exceed the interest that people have in being, for example, kept together with other residents of Seal Beach, or of Tustin, or of Laguna Hills – or of Orange County itself. Most municipal decisions that people understand are divided by these boundaries. But there are exceptions:

- The Vietnamese community in OC is, unlike most other Asian local communities, geographically compact and coherent. Westminster and Garden Grove belong together. The benefit of adding Santa Ana is to be weighed against the costs of splitting a city (and moving many people who aren't Vietnamese along into "the Vietnamese district.") The Vietnamese presence in Fountain Valley and Huntington Beach is too attenuated too let it control the lines.

- The Latino community in OC is large and fairly cohesive, being especially prevalent in Santa Ana, Orange (west of the 55), Anaheim (west of the 55), Placentia, Buena Park, Stanton, La Habra, southern Fullerton and parts of Brea, Tustin and Costa Mesa. The suggested lines here strive to keep these communities largely together. Santa Ana and the relevant portions of Anaheim and Orange are the core of the Hispanic representation of the district. One can connect the other communities across the top, as in the suggested Congressional District, or one can create one district west of Yorba Linda and (when that ends) combine the western portions that are predominantly Latino with adjoining, and also largely Latino, areas of Los Angeles County. Such districts would also contain many Asian voters (who are not enough to dominate a district.)

- The main non-ethnic "communities of interest" in Orange County are wealth and topology. Essentially, flatter areas tend to be less wealthy than the hillier ones, with notable exceptions along the central coastal flood plain and in some canyon areas. The clearest dividing line between them is probably SR-55, which has here been used to divide several cities, but I-405 (and to some extent SR-22) also tend to divide the wealthier coastal areas from the less-wealthy flat inland areas. Orange County becomes somewhat hilly again in the north, even west of I-55, in parts of Fullerton and Brea, with accordingly higher incomes, but these are much less significant than the differences in the south and east. (Essentially: people in Fullerton are used to being in the same district as other people from Fullerton; it should not surprise them.)

- OC's Coastal communities have a fair argument to constitute a community of interest.

Most other "communities of interest" that I saw suggested in the two meetings I attended were fairly theoretical, small and attenuated, less likely to be significant to people than is city or county identity. Some communities may be coherent, but are simply too small to much influence a district's politics.

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External borders

North: The Puente Hills not only contain part of the LA & Orange County border, but people rarely travel over them and most often travel around them. North Orange County and the southern San Gabriel Valley are not contiguous in practice. Asian groups in both areas are separate communities of interest.

Northern Northeast: The gap following SR-91 towards Riverside and San Bernardino Counties (Chino Hills, Corona) is an inferior community of interest. While many people drive across SR-91, relatively few do so between adjacent communities. (There are less direct ways to travel between them with much less traffic.) The county line should be respected here if possible.

Balance of Northeast: The depopulated Cleveland National Forest and the Santa Ana Mountains form a border that should be respected. Few people drive through rather than around them.

Southeast: While Camp Pendleton forms a natural boundary between Southeast Orange County and Northwest San Diego County, the highly-traveled I-5 quickly connects southern OC cities such as San Clemente to northern SD cities like Oceanside.

West: Above the Pacific Ocean to the southwest, OC's northwest border with LA County is permeable and frequently crossed. Whether one creates the shared district here, versus to the southeast, depends on the numbers of leftover votes in other counties.

As it happens, in Congressional Districting the numbers work out so that a district crossing OC's southeast border makes great sense (because the "leftover" portions of the combined San Diego and Imperial County area and the "leftover" portions of Orange County combine to make about one district.) In Assembly Districting, San Diego and Imperial combined to make almost exactly seven districts on their own (such that about 3500 people can be shared with a Riverside County district), so for these purposes it makes sense for OC's districts to instead cross the LA County line in the Cerritos/La Mirada area.

Note: I've presumed that gerrymandered 46th Congressional District, which most people seem to hate, will be eliminated. I've used that number for a new district bridging OC and northern San Diego.

Internal borders

Contiguity: What communities fit together will depend as much on freeway as on geographic proximity. Areas such as the Cleveland National Forest and Santa Ana Mountains are for the most part a depopulated "dead zone." Even though, say, CD-42 appears contiguous on a map, in practice it is not contiguous because one rarely drives, say, from Yorba Linda to Mission Viejo directly.

Communities of interest: The African American community tends not to be concentrated geographically. The Latino community is prevalent, among other places, in the Buena Park and La Habra through Orange and Anaheim (west of the 55) and Santa Ana and Placentia. Asians communities are spread throughout OC, but the Vietnamese community is highly enough concentrated in Garden Grove and Westminster to have a significant effect on districts containing these cities. No religious communities seem compact.

Following natural, established, and recognized boundaries: One charge of the Redistricting Commission is to avoid a result that looks like a gerrymander – which confuses and saps the confidence of the public. The best way to do so is to, whenever possible, draw lines that make sense to people. This means, when possible, respecting county borders and respecting city borders. One exception is when constructed or natural boundaries (such as, respectively, major freeways and rivers) exist. Anaheim is an example of a city that is difficult to keep in one district due to its being so long and narrow. The Costa Mesa Freeway (SR-55) is a recognized marker that can divide it in a way that people intuitively understand, especially given the hillier topography, lower density, and higher wealth of most communities to the east of it.

Proposed Congressional Districts for Orange County (with explanations of communities of interest)

Please note: In this and in subsequent descriptions of districts, the number (and sometimes description) of a district and the cities (or portions thereof) comprising it are in **bold**, while any comments I have about the communities of interest within the districts are in plain font.

40: Seal Beach, Los Alamitos/Rossmoor, Stanton, Garden Grove, Westminster, Huntington Beach, Fountain Valley, Costa Mesa (W of 55). These western OC cities are (1) mostly near to the ocean; (2) mostly well-off but not as wealthy as the communities to the south; and (2) have a relatively large Asian community, including the Vietnamese communities in Garden Grove and Westminster. The Asian community will be able to grow in this district without being dominated by the Latino community.

42: Cypress, La Palma, Fullerton, La Habra, Brea, Yorba Linda, Placentia, Yorba Linda, Anaheim (E of 55/91/90), North Canyons (Weir), Orange (E of 55) , Villa Park, Tustin, Lemon/Panorama Hts. These are mostly North OC communities. The district is less compact than some because it stretches around the relatively compact CD-47. While it has some diversity in its income, with La Habra and Placentia being the least wealthy and Yorba Linda, Anaheim Hills, and Villa Park being the most wealthy, most of the range is not all that extreme. It is a racially diverse district, connecting Asian areas to the west and east (which are relatively similar economically) and would not be that hard to traverse.

46 (shared district): (South OC): Dana Point, Laguna Niguel, San Juan Capistrano, San Clemente, empty East; (NW San Diego County): Pendleton/San Onofre, Oceanside, Fallbrook, Carlsbad, Vista; but <u>not</u> including Encinitas, Escondido, San Marcos. Orange County needs to share at least one district. These southernmost cities in OC (along with the mostly empty East south of the Cleveland National Forest) fit well with the north San Diego County cities south of Camp Pendleton. (To compensate, the shared Assembly and Senate Districts can leave South OC together and extend into LA County to the northwest.) This is mostly a well-off area with lots of retirees, underwater housing prices, and a Caucasian population with Latino cultural influences.

47: Santa Ana (W of 55), Anaheim (W of 55/91/90), Orange (W of 55). This is a compact, largely Latino area (with other ethnicities present) of moderate to low income. This is much more cohesive than a district that includes Garden Grove's Vietnamese community; it lets the Vietnamese community mature separately. One could keep more of the Vietnamese community together (by dividing the city of Santa Ana), one could consider moving that area into CD-40 while moving largely Latino Stanton into CD-47.

48: Newport Beach, Santa Ana (E of 55), Costa Mesa (E of 55), Irvine, Laguna Beach, Mission Viejo, Lake Forest, Laguna Woods, Laguna Hills, Aliso Viejo, Rancho Santa Margarita, most of Canyon Country. This is a relatively wealthy area, mostly Caucasian and Asian, including most of the "new communities" of South Orange County north of those in CD-46. Housing prices here are also underwater. This treats the Santa Ana River as a natural barrier between districts.

Proposed Assembly Districts for Orange County (numbering to be determined)

The current numbering of Assembly Districts is odd, so I don't try to assign these numbers. The most distinctive aspect of this plan is that it divides Anaheim – which stretches almost the entire way across Orange County – among four districts. This is a circumstance where dividing up one city makes it much easier to create cohesive districts. (1) Westernmost Anaheim fits with Buena Park and Stanton; (2) the portion of Anaheim south of Fullerton and Placentia fits with those cities; (3) the portion bordering Santa Ana fits with it; and (4) Anaheim Hills fits with Yorba Linda, unincorporated Orange, Villa Park, etc. Also split: Orange and Santa Ana (by the 55), Laguna Hills, Huntington Beach (by Beach Blvd.), Irvine.

(A) Northern: La Habra, Brea/Olinda, Fullerton, Placentia, Anaheim (E of Dale, W of Harbor, + N of Lincoln to SR-57). This district has a cohesive North Orange County identity. The critical (and possibly unusual, but I think proper) move here is to group Yorba Linda with the northeast and east central areas of Orange County with which it has substantial affinity. This leaves a district with a substantial Latino population but a fair amount of economic diversity, with some higher-income areas in hills and plains of Brea and Fullerton. These differences are nowhere near as great as one would find if one included Yorba Linda or the central coast or South County.

(B) Central: Anaheim (S of Lincoln between Harbor Blvd. and SR-57,), Orange (W of 55), Santa Ana (W of 55). This, again, is a heavily Latino and lower-income district, but one that makes much more intuitive sense than the current boundaries.

(C) Western: Los Alamitos/Rossmoor, Seal Beach, Garden Grove, Westminster, Huntington Beach (W of SR-39). This is similar to CD-40, but even more focused on the Asian community (especially Vietnamese) and the western beach cities. Dividing Huntington Beach isn't optimal, but this is a natural division between "old" (western and northern) and "new" (eastern) Huntington Beach. The latter is in the flood plain and has greater affinity to Fountain Valley/Costa Mesa/Newport.

(D) Central Coast: Huntington Beach (E of SR-39), Fountain Valley, Costa Mesa, Santa Ana (E of 55), Newport Beach, Irvine (W of Jamboree or S of I-405), Laguna Beach, Aliso Viejo, Laguna Woods, Laguna Hills (N). This admittedly joins two somewhat disparate communities, roughly on either side of Orange County Airport, but they are a decent fit. South Orange County is now too large to be in one Assembly District., so moving Foothill Ranch up with Irvine and the Canyons and the northern portions of South OC with the area between Beach Blvd. and I-55 is a good adaptation to its growth. Aliso Viejo and the northern Lagunas are socioeconomically and culturally similar to the western areas of the district, which could be thought of as people who are likely to shop at South Coast Plaza and Newport Center.

(E) Central Inland: Yorba Linda, Anaheim (E of 57), Orange (E of 55), Lemon Heights and Panorama Heights, Villa Park, Tustin, Irvine (E of Jamboree and N of I-405), Foothill Ranch, Silverado, almost all canyons. This is a generally well-off district (even Tustin and the canyons are mostly at least middle-class), largely Caucasian and Asian. It's distinct from the Central Coast in not being coastal. This is the primary "toll road" area of the county; most of it is near the 55.

(F) South County: Laguna Hills (S), Lake Forest, Rancho Santa Margarita, Coto de Caza, Mission Viejo, Laguna Niguel, Dana Point, San Juan Capistrano, San Clemente, Trabuco Highlands, Dove Canyon. This includes as much of South County as fits into one district. Laguna Hills is naturally split as it is; here, separating the halves was better than other options for population balance.

(G) Northwestern (*shared district*). (OC): Buena Park, Cypress, La Palma, Stanton, Anaheim (W of Dale) (Los Angeles): Cerritos, Artesia, La Mirada, Whittier, area south of Friendly Hills, La Habra Hts. OC has to be split somewhere; this leads to an almost perfectly "half-and-half" LA/OC district that gives the Asian community straddling the county a common district.

Proposed Senate Districts for Orange County (numbering to be determined)

(1) Northern, composed of Assembly Districts A + B. La Habra, Brea/Olinda, Fullerton, Placentia, Anaheim (E of Dale and W of 57), Orange (W of 55), Santa Ana (W of 55). These are mostly (although not entirely) lower income and predominantly Latino areas. Brea is a possible exception, but most of Brea has more commerce with Fullerton and La Habra than Yorba Linda.

(2) Coastal, composed of Assembly Districts C + D. Los Alamitos/Rossmoor, Seal Beach, Garden Grove, Westminster, Huntington Beach, Fountain Valley, Costa Mesa, Santa Ana (E of 55), Newport Beach, Irvine (W of Jamboree or S of I-405), Laguna Beach, Aliso Viejo, Laguna Woods, Laguna Hills (N). This is most of the coastal area (and several miles inland) from the Los Angeles County border to the southern part of South Orange County. It will be easily traversed by the 405, 22, 55, and 5 south of Irvine.

(3) Eastern, composed of Assembly Districts E + F. Yorba Linda, Anaheim (E of 57), Orange (E of 55), Lemon Heights and Panorama Heights, Villa Park, Tustin, Irvine (E of Jamboree and N of I-405), all Canyons, Silverado, Foothill Ranch, Laguna Hills (S), Lake Forest, Rancho Santa Margarita, Coto de Caza, Mission Viejo, Laguna Niguel, Dana Point, San Juan Capistrano, San Clemente. The northern part of this district will be accessible through I-55 and the toll roads; the lower half primarily through the 5. This district combines the northern and eastern foothills and canyons with the similar topology of most of South County. It is inland except for the southernmost portion. It is high income and highly Caucasian with some Asian and Hispanic areas.

(4) Northwestern, composed of Assembly District G and an LA County District. The Orange County cities (about 1/4 of the district) would include Buena Park, Cypress, La Palma, Stanton and Anaheim (W of Dale). The Los Angeles cities would include Cerritos, Artesia, La Habra Hts, La Mirada, Whittier, and the area south of Friendly Hills, combines with a separate assembly district most likely containing Norwalk, Santa Fe Springs, Pico Rivera, etc. This would be a mostly low to moderate-income district. The commerce between these areas of Orange County and those to their west is considerable; the streets are part of the same grid. The area would probably be majority Hispanic with large Asian and Caucasian minorities, which fairly well matches these areas of Orange County.

Board of Equalization Districts

I have not noticed anyone suggesting Board of Equalization districts, so I present this "map" to you. (Again, it's simple enough that it does not require pictures, just names of counties and cities.)

I am once again adhering to the idea that where it is possible to draw lines that match city and county borders, it is preferable because it is easier for citizens to understand and appreciate.

As with my other maps, I have not looked at where any incumbents or prospective candidates live, nor at the partisan makeup of each prospective district (or its obvious correlates such as voting behavior.)

The following plan presents Board of Equalization Districts that divide only three counties and no cities. The districts are: (1) Non-coastal north of Los Angeles (2) Coastal north of Los Angeles, (3) Los Angeles and (4) South and East of Los Angeles. Their specific components are:

(1) **Northern and Eastern California:** All of Del Norte, Siskiyou, Modoc, Humboldt, Trinity, Shasta, Tehama, Lassen, Plumas, Glenn, Butte, Yuba, Sierra, Lake, Colusa, Yuba, Nevada, Yolo, Sacramento, Placer, El Dorado, Amador, Alpine, San Joaquin, Calaveras, Tuolumne, Mono, Stanislaus, Merced, Mariposa, Madera, Fresno, Inyo, Kings, Tulare, Kern, and the balance of Solano, Los Angeles, and San Bernardino Counties not accounted for below.

(2) **Coastal Northern and Central California:** All of Ventura, Santa Barbara, San Luis Obispo, Monterey, San Benito, Santa Cruz, Santa Clara, San Mateo, San Francisco, Alameda, Contra Costa, Marin, Sonoma, Napa, Mendocino, and in Solano County the cities of Vallejo, Benecia, and Vacaville.

(3) **Los Angeles County:** All of Los Angeles County south of I-210 and north almost to SR-128, plus all of: Santa Clarita, Stevenson Ranch & westward, City of Los Angeles, Glendale, La Crescenta, La Canada Flintridge, Pasadena, Sierra Madre, Arcadia, Monrovia, Bradbury, Duarte, Irwindale, Azusa, Glendora, San Dimas, La Verne and Claremont.

(4) **South and East of Los Angeles County:** All of San Diego, Imperial, Orange, and Riverside Counties and San Bernardino County cities of Chino Hills, Chino, Montclair, Upland, Rancho Cucamonga, Ontario, Fontana, and other unincorporated areas west of Rialto.