



November 12, 2021

California Citizens Redistricting Commission  
721 Capitol Mall, Suite 260  
Sacramento, CA 95814  
*Sent via electronic transmission*

***Re: Important decisions and best practices for next phase of mapping process***

Dear Chairs Turner, Taylor, Yee and Commissioners:

Thank you for the countless hours you put in toward the timely release of your first draft maps. We recognize that you worked tirelessly to meet an accelerated draft map deadline in response to public input. As you prepare to enter this next phase of your mapping process, we urge you to take advantage of your November 15, 2021, business meeting to discuss your approach for the home stretch of this process and to consider improvements in three important areas that will enhance your ability to deliver final maps that are reflective of California's diverse communities:

**1) Develop time management protocols that will ensure sufficient time is dedicated to the most populous and diverse regions of the state.**

We understand it is challenging to work through multiple statewide maps over a matter of days. But the Commission should establish guardrails to ensure that it does not, because of extensive conversation about less populated areas of the state, inadvertently spend a disproportionately low amount of time on the more populated, urban, diverse, and sometimes more complicated, areas of the state. The Commission has acknowledged that many components of the first drafts, particularly the Assembly districts in and around Los Angeles County, received insufficient attention and will require considerable work before being finalized. As some commissioners have noted, it could take at least two days to go over Los Angeles at the level of detail that is warranted to ensure fair representation. Indeed, the problem is not unique: the prior Commission acknowledged that it had failed to dedicate sufficient input and line-drawing time to the densely populated urban areas where the fair and equitable application of the redistricting criteria can be the most challenging.

Inadvertently spending a disproportionately low amount of time on diverse, urban areas of the state creates two problems in addition to shortchanging line-drawing in the most complicated areas. First, these are the most populous parts of the state, and underemphasizing them limits the public comment opportunities where the greatest number of people may wish to give that comment. Second, these are the parts of the state where underrepresented communities are often concentrated and underemphasizing them may have the functional effect of inadvertently marginalizing the communities your redistricting criteria are designed to empower and protect.

We encourage you to discuss ways to manage your time more efficiently, such as setting time limits on commissioner comments and scheduling dedicated time blocks for the different regions of the state. Those time blocks could proportionately allocate time based on population density and line-drawing complexity.

**2) Establish a clear framework for group decision-making in producing additional draft maps and the final maps, particularly for addressing the important issues that were not discussed or resolved prior to the release of your first draft maps.**

The Commission's approach to visualizations and live line drawing over the past two weeks primarily revolved around individual commissioners engaging directly with the line drawers, with little discussion among the Commission as a whole about the impact of proposed changes on major regions or on the overall maps. That work enabled you to meet an accelerated deadline for draft maps, which was responsive to public comment. We urge you to now take a step back and evaluate the big picture of what you hope and need to achieve over the next six weeks, and how you will get there. This discussion should be held prior to the next phase of line drawing and input from the public.

Determining how you will frame and advance these conversations implicates a number of questions, many of which you are no doubt aware. How will you make decisions and provide direction, as a group, to the line drawers? How will you resolve conflicts in the public input and disagreements between commissioners? Will you vote on your directions to line drawers to provide them with more clarity of purpose? Will you ask the line drawers to come back with proposed new drafts that you can discuss and vote on? Or will you attempt to work from a second round of visualizations, which can potentially make it easier to avoid tough conversations and kick important decisions further down the road?

It is important to note that the constitutional and statutory framework for your work allows you to post additional draft maps with a shorter, 7-day public comment timeframe. The time you have allotted yourselves for this next phase of the process thus leaves open the possibility of making some tough decisions earlier and providing another set of drafts maps for the public to evaluate and react to. We hope you will discuss these questions and establish a clear framework for how you will proceed.

Finally, group decision-making will require participation from the full Commission, and a dedication to reconciling, as best as possible, the multiple interests that exist throughout the State of California. It is sometimes unclear whether quieter commissioners are not speaking because they agree with the conversation or because they are withholding their endorsement. We encourage all commissioners to make their views known and to participate in discussions regarding the entirety of the state.

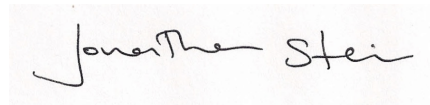
**3) Ensure meaningful opportunities for public participation during Commission meetings.**

We appreciate that the Commission has offered an appointment system for the upcoming public input meetings, but we understand those appointment slots were filling up almost as soon as the portal launched. This suggests that only those who watch your meetings closely or receive your email announcements had an opportunity to sign up. It also suggests that some were grabbing slots preemptively, i.e. before the public even had a chance to review your draft maps and determine whether they would provide input. There will likely be many more members of the general public that wish to engage you directly through live public comment during your input meetings. We urge you to allow for more time for public input, to make it clear to the public when a queue will open at the end of each day's appointments, and to allow those additional speakers the same amount of time as those with appointments.

Additionally, we urge you to offer a time certain for public comment on each day you meet after the conclusion of the public input meetings, and to allow sufficient time for callers to get into the queue. This will encourage participation by a more diverse audience whose input is critical as you face tough decisions ahead. The current approach of opening up public comment at unpredictable times, and sometimes not at all, and then allowing a short window for the public to dial-in and get into the queue, means that those who can sit and wait through multi-hour meetings are most likely to take advantage. This of course inadvertently favors individuals and populations that have work flexibility and high political literacy. A time-certain public comment may make it easier for underrepresented communities, which likely do not have the time to watch long meetings and be ready to participate on a moment's notice, to more effectively participate in your process.

Thank you again for your dedicated service toward a fair and inclusive redistricting process.

Sincerely,



Jonathan Mehta Stein  
Executive Director  
California Common Cause



Carol Moon Goldberg  
President  
League of Women Voters of California

Cc: Alvaro Hernandez, Executive Director