

November 14, 2021

California Citizens Redistricting Commission
721 Capitol Mall, Suite 260
Sacramento, CA 95814

Sent via electronic transmission

Dear Chair Taylor, Vice Chair Toledo, and Commissioners:

Congratulations on reaching this next major benchmark in the redistricting process: developing and releasing your first set of draft maps. We appreciate the hard work and dedication you have devoted to this task. This extraordinary undertaking now sets the stage for further consideration of district lines to get us closer to creating fair maps for all Californians. As you prepare for the coming days of public feedback on draft maps, it is imperative that the Commission ensures that all communities, specifically those that face the greatest barriers to participation, are provided with fair access to opportunities to inform the next stage of line drawing.

In particular, we want to bring attention to the opportunity for public comment as it relates to the upcoming set of draft map public feedback meetings. Given that in a matter of hours of posting the appointment link for these meetings, all of the appointment slots were already taken up, we are deeply concerned that:

- Key segments of the population, especially low-income communities of color, were left out from securing an appointment to speak directly to the Commission and provide critical feedback on the draft maps. In particular, your appointment link went live before detailed maps were released to the public, and appointments were full before most members of the public who were not watching your November 10th live line-drawing session would have been made aware that draft maps were published.
- Your process and approach to public comment opportunities may be creating inequities in participation, where individuals that are privileged with more time, flexible work hours, favorable economic/family conditions, and with a higher degree of political efficacy, are better able to stay informed and take advantage of speaking opportunities.
- Verbal public comments may be having a stronger and deeper impact on your line drawing direction than written testimony, given that (1) these leave a lasting impression when heard live, (2) Commissioners may be limited in their capacity to fully read every written testimony submitted, and (3) written comments are not read or heard aloud by the public. This could create a situation where the voices of communities who did not secure an appointment are left at a disadvantage and less likely to be taken into account, even if they submit written testimony.

- Your policies on how public input meeting appointments are allocated continue to be unclear and inconsistent, resulting in further inequities in your system. For example, the Commission's motion for the public comment time slot schedule is inconsistent with what is posted on different pages of the CCRC's website. In addition, the instructions indicated on the appointment sign-up form did not fully detail all policies and procedures for registering for an appointment, leaving ambiguities and opportunities for members of the public to incorrectly register for an appointment. As you know, there were also ambiguities during the map presentation appointment process that caused some organizations to interpret the Commission's policies and procedures differently. For the upcoming public feedback meetings, it is unclear whether there are additional restrictions and/or limitations to signing up. And, if there are, there is no clear direction on how organizations/entities should go about doing so.

We recognize you are committed to removing as many barriers to public participation as possible and have been innovative in creating various avenues for public input. To further support your efforts, especially regarding your draft maps, we recommend the following actions:

1. **Shorten the times for public comment during the November 17-23 feedback meetings from five to three minutes.** This will help generate additional appointment slots for each of these dates, increasing opportunities for more members of the public to sign up and speak.
2. **Extend the public comment portion at the end of the public input meetings to at least one hour.** This will allow more members of the public, who were left without an appointment, the opportunity to still call in and be heard.
3. **Schedule additional public feedback sessions on November 24 and for a portion of the November 29 Commission business meeting.** This creates at least two more opportunities for the public to sign up for an appointment and speak to the Commission before you pivot to live line drawing once more.
4. **Ensure that the appointment form clearly informs the public that a slot will be limited to one unique email per session.** This will ensure everyone clearly understands your policy for signing up for appointments and better inform groups, especially community-based organizations, who may be signing up on behalf of residents and/or members of underrepresented communities, to gather every individual's email ahead of time to sign up.
5. **Provide the public with a more robust analysis of what you are taking into account and incorporating into your maps from both written and oral public testimony.** We ask that you at least: 1) provide a summary of the written comments coming in during every meeting so that the public is informed and know that the Commissioners are reading these, and 2) reintegrate the COI testimony you received during the summer and the map submissions received in October throughout your discussions so you are continuously making connections and further analyzing the spectrum of testimony

received across the board, not just the most recent public comments received. This will demonstrate how written testimony carries equal weight as oral testimony for the Commission, and also provide the public insights into how you are analyzing and balancing various COIs, map configurations, and general feedback received across time.

We strongly urge you to consider these recommendations and take the necessary actions to ensure a fair access to and consistent policies for public comment opportunities moving forward that center communities who face greater hardships to public participation.

Sincerely,

AAPIs For Civic Empowerment Education Fund
Advancement Project California
Alliance San Diego
Asian Americans Advancing Justice - Asian Law Caucus (AAAJ-ALC)
Bay Rising
California Black Census and Redistricting Hub
California Calls
Central Coast Alliance United for a Sustainable Economy (CAUSE)
Council on American-Islamic Relations - California (CAIR-CA)
Equality California
Environmental Voters Education Fund
Inland Empire United
Mi Familia Vota
NALEO Educational Fund
Orange County Civic Engagement Table (OCCET)

CC: Alvaro Hernandez and Marcy Kaplan