

May 12, 2021

California Citizens Redistricting Commission  
C/O Public Comment  
721 Capitol Mall, Suite 260  
Sacramento, CA 95814

Dear Commissioners:

On behalf of the undersigned organizations, we are writing to urge the Commission to schedule at least one more community of interest (COI) input meeting in Los Angeles County, and possibly more, to ensure that Los Angeles County residents have fair access to providing the Commission with their perspectives on their COIs. We are also writing to ask the Commission to clarify the scope and format of the “group” and “statewide” COI input meetings on its proposed schedule between September 8 and September 11, 2021 (for the purposes of this letter, “proposed schedule” refers to the Commission’s “Future Meeting Dates Proposal Version 3 – 5.4.2021”).

The undersigned organizations make up a diverse group of organizations across California united by a mission to strengthen the political empowerment of under-represented communities in the redistricting process. We include grassroots organizations, civil rights organizations, good government organizations, and civic engagement organizations.

We would first like to express our appreciation for the thoughtfulness of the Commission and the time Commissioners have spent in examining the broad array of considerations that affect the number and location of COI meetings, including the size of the population in its outreach areas, and the geography of the state. We also appreciate that the Commission has been responsive to public input about the scope and format of these meetings. However, we believe that the proposed schedule still needs to offer additional opportunities for residents of Los Angeles County to provide input about their COIs at a Commission meeting which focuses on the County.

One measure which can be used to assess the parity with respect to the number of COI input meetings between each of the Commission’s outreach zones is to divide the number of residents in each zone by the number of meetings in the proposed schedule for the zone. We understand that as a practical matter, the number of community members who will attend or submit testimony at a COI input meeting will not be evenly divided between the input meetings scheduled, and that several factors will affect meeting participation. However, we believe that the number of residents per meeting can provide a general indicator of whether the meetings scheduled can meet the needs of the populations in each zone. Thus, the table below sets forth this figure for each zone – where the Commission is proposing to schedule a group COI meeting for a zone, the table sets forth both the number of residents per meeting not including the group meeting, as well as the number including that meeting.

Outreach Zone	# of Residents Per Meeting (W/out Group Meetings)	# of Residents Per Meeting (W/Group Meetings)
A – North Coast	471,894	N/A
B – North Inland	298,628	N/A
C – Bay Area	1,770,293	1,416,234
D – Greater Sacramento Region	1,330,111	N/A
E – Central Coast	1,154,763	N/A
F – Central Valley	1,452,654	N/A
G – Inland Central	93,454	N/A
H – Los Angeles County	2,511,115	2,008,892
I – Inland Empire	1,543,454	N/A
J – Orange County	788,441	N/A
K – San Diego	1,167,146	875,360

*Source for population data: California Department of Finance, Demographic Research Unit, Report E-1, Population Estimates for Cities, Counties and the State, as January 1, 2021; released May 7, 2021*

We believe that the foregoing table demonstrates that Los Angeles County residents will not have proportionate access to meetings as those in other outreach zones. We note that the number of residents per meeting in Los Angeles County exceeds that of the next most populous outreach zone – the Bay Area, by 740,822 residents – a number equal to 29.5% of the number of residents per meeting for Los Angeles County. Even with the addition of the group meeting for Los Angeles County, this disparity persists. The number of residents per meeting for Los Angeles County taking into account the group meeting exceeds that of the Bay area by 592,658. Because of the potentially large number of community members in Los Angeles County who would be interested in submitting testimony at a COI input meeting, we are concerned that the lack of parity could result in Los Angeles County meetings running for a much longer time than those in other outreach zones, creating particular challenges for those from under-represented communities who have demanding work or family responsibilities.

Our concerns about the disproportionate number of meetings scheduled for Los Angeles County is exacerbated by the fact that collecting COI input in Los Angeles will be particularly complicated, because of the racial, ethnic and linguistic diversity of the County. The County also has many low-income residents and many experiencing housing insecurities, which will also create challenges for engaging residents in the COI input process. We understand that

community members will be able to provide input without attending an input meeting. However, the ability to provide input “face-to-face” to the Commission (even if done virtually) is a particularly powerful form of engagement for community members, and Los Angeles residents should not be disadvantaged by a relatively low number of COI input meetings.

In recommending that the Commission add at least one more COI input meeting for Los Angeles County, we note that we are not recommending that the Commission decrease the number of meetings in other outreach zones. We strongly believe that the Commission should re-examine its budget to see whether additional meetings are feasible. In this connection, we note that adding only one COI input meeting for Los Angeles County would still not achieve optimal parity with the Bay Area – adding one meeting would bring the number of residents per meeting to 2,008,892, which still exceeds the number per resident for the Bay Area.

Clarification of “Group COI input” meetings

We also request that the Commissioners provide clarification on the scope and the format of the “Group COI input” meetings set forth in the proposed schedule. This will help stakeholders better assess the parity with respect to the opportunity to submit input at COI meetings throughout the state and the accessibility of those meetings to community members.

Thank you again for your thoughtful hard work on the design of the proposed schedule for COI input meetings. We believe you share our vision of a public input process where all California community members have fair access to the process, and we look forward to continuing our work together to achieve this important goal.

Sincerely,

Asian Americans Advancing Justice – Asian Law Caucus

Asian Americans Advancing Justice - LA

California League of Conservation Voters Education Fund

IE United

League of Women Voters of California

NALEO Educational Fund