

**FOUNDER EMERITUS**Hon. Edward R. Roybal[†][†]deceased**CHAIR**Hon. Alejandra Sotelo-Solis
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Lemieux O'Neill, LLP**SECRETARY**Ms. Michelle Mancias, Esq.
Assistant VP and Counsel,
State Farm®

May 9, 2023

California Citizens Redistricting Commission
721 Capitol Mall, Suite 260
Sacramento, CA 95814*Sent via electronic transmission***Re: Comments on CCRC Draft "Recollections, Recommendations and Resources" Report**

Dear Members of the California Citizens Redistricting Commission:

On behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, I would like to thank the California Citizens Redistricting Commission (CCRC) for its commitment and thoughtfulness in drafting the Recollections, Recommendations and Resources Report. As the Commission continues to refine the report, we would like to offer input into some areas that for the future, will facilitate Latino participation in the redistricting process and result in lines that are fair for Latinos and all of California's underrepresented communities.

NALEO Educational Fund is the nation's leading nonprofit organization that facilitates full participation of Latinos in the American political process, from citizenship to public service. Our Board members and constituency encompass the nation's more than 7,000 Latino elected and appointed officials nationwide, and include Republicans, Democrats, and Independents. We are one of the nation's leading organizations in the area of Latino civic engagement, and we are deeply committed to ensuring that California's redistricting provides the state's Latinos with a fair opportunity to choose their elected leaders. During the Commission's 2021-2022 line-drawing, our "Latinos Draw the Line" campaign helped Latino community members throughout the state to understand the importance of redistricting, and mobilized community members to provide input to the Commission during the redistricting process.

Over a year ago, NALEO Educational Fund and a group of partner organizations submitted initial perspectives on lessons learned and submitted recommendations based on our experiences during the 2020 redistricting cycle. These recommendations are included in a [collective letter](#) from the collaborative. We are grateful that many of the recommendations in our collaborative's letter are referenced in the CCRC draft "[Recollections, Recommendations, and Resources Report Volume 1 \(Second Draft\)](#)" which appears on the CCRC website dated April 09, 2023 (referred to herein as the "draft report").

We believe the most helpful way to share our input is to compare recommendations from the collective letter to certain sections or recommendations in the draft report, and in Appendix A to this letter, we offer a detailed comparison of certain sections of these two documents. We focus on some areas where we think the Commission's draft report still merits attention, and we offer our perspectives and recommendations. We hope that our input is helpful and constructive as the Commission continues its work on refining the draft report. We also note that while we make references to the collective letter, all perspectives provided in this letter are those of the NALEO Educational Fund, and may not necessarily represent those of other collaborative members.



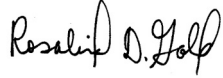
California Citizens Redistricting Commission

May 9, 2023

Page 2

We thank the Commission and the Lessons Learned subcommittee for your dedication to developing the draft report and for continuing to actively work to ensure the next Commission has the tools needed to succeed. We look forward to continuing our work together. If you have any questions about our feedback, please contact Jacqueline Coto, State Director of Civic Engagement Policy, at jcoto@naleo.org.

Sincerely,

A handwritten signature in black ink that reads "Rosalind D. Gold". The signature is written in a cursive style with a large initial "R" and "G".

Rosalind Gold
Chief Public Policy Officer

APPENDIX A

Application and Selection Process

1. While not addressed in the collective letter, we appreciate the draft report underscoring the need to increase the number of qualified Latino/Hispanic applicants for the Commission of all different political affiliations. We also appreciate the report highlighting that the random draw selection process for the first eight Commissioners yielded no Latinos. In this connection, we note that while Latinos were 22% of the total top 60 applicants, their distribution across the different partisan pools was uneven, with Latinos being 40% of Democrats, but only 15% of No-Party-Preference and only 15% of the Republican pool. In creating a diverse pool of finalists, we believe the draft report should include even more emphasis on the need for the Applicant Review Panel to recruit more qualified Latinos from diverse partisan affiliations, and ensure that each partisan pool reflects the full diversity of the state's population, including Latinos.

Public Participation

2. In the collective letter, we noted that the 2021 CCRC generated enormous volumes of public participation, including verbal testimony, written and email input, map submissions, and we also believe that the CCRC generally achieved its goal of centering the public in the state's redistricting process. However, in the draft report, we found no specific section for public input/public engagement that outlines the public participation protocols that would help the next Commission also achieve this goal, and we recommend that the CCRC consider developing and including them in the draft report.
3. In the collective letter, we recommended providing a clear schedule to the public regarding public meetings and hearings. The draft report considers implementing agenda/motion/meeting management software early and implementing a consistent motions-documenting procedure from the start via a software system. If possible, it would be helpful to learn more about the capabilities of the software so that we can offer specific feedback or any concerns we hope the software will be able to address.

Outreach

4. In the collective letter, we recommend that the CCRC hire Outreach Specialists, especially those who know hard-to-reach communities. The draft report does note that having core Communications and Outreach staff in place should be considered part of being "fully functional." In addition, it is recommended to establish an extension office in Southern California for use through the mapping phase. While the CCRC notes the importance of having core Communications and Outreach staff in place, it does not explicitly recommend hiring Outreach Specialists to specifically assist the hard-to-reach communities and does not specifically recommend increasing in-house outreach staffing. We urge the Commission to include these recommendations in the draft report.

Commissioner Participation

5. In the collective letter, we noted the CCRC should develop rules about Commissioners who repeatedly do not participate and/or attend meetings and set thresholds for triggering intervention, removal proceedings, or other measures, if necessary. However, while the draft report provides a general recommendation to set a shared standard early for Commissioner's attendance and participation, we believe it would benefit to include a more specific protocol as suggested above.

CoI and Mapping Input Process

Online Public Input Forms

6. In the collective letter, we noted that the online public input form was helpful and made it easy for members of the public who could not call into hearings to submit their feedback to the CCRC website. However, we also noted that the process for the public to submit information through this form was inconsistent. One version allowed the public to include attachments and one did not.

We would like the draft report to highlight that the online public input form also served as a useful tool for the community and merits reference to be included in the report, in addition to mentioning the value of the Community of Interest (CoI) tool. The draft report should also note the need for consistency with respect to the public's ability to submit attachments through the CoI public input form.

7. In the collective letter, we noted the CoI input form was a good way for the public to provide information to the CCRC regarding their CoI. However, the form included a drop-down menu of factors that was long and confusing. It was unclear whether the Commissioners reviewed the selected factors in a given CoI submission. If they were not reviewed, the form should not include the factors. If they were reviewed, the factors should be pared down and not overlap. The draft report references the popularity and helpfulness of the CoI tool. However, we feel that the report should also reference the need to ensure that the tool is more accessible to the public when it is first released, with an online tutorial readily available from the outset. We also believe the draft report should specifically address resolving the drop-down menu issues that our community members continually encountered.

Call-in process for the CoI input

8. In the collective letter, we noted the call-in process for the CoI input meetings was fairly effective. It was good that appointment slots were provided within a 90-minute window so that members of the public did not need to wait in a queue for multiple hours. However, the process for calling in was somewhat complicated and some community members had difficulty navigating zoom and knowing when to speak. We appreciate that the draft report reflects an acknowledgment of the complexity of the process for calling in - however, it would be valuable to provide specific recommendations to promote an easier method to navigate the call-in process.

The call-in process for CoI input with documents

9. In the collective letter, we noted the Commission should create a system that allows speakers to submit follow-up documents. For example, some people called in to describe a CoI but wanted to submit a map later. The draft report acknowledges the value of creating a system for speakers to submit such documents, but we believe it should include specific recommendations for a way for speakers to link a document before their appointment and after their appointment if needed. These recommendations could include creating a unique submission email for people with appointments, allowing people to attach an image when they register for an appointment, and/or sending a follow-up email after people speak inviting them to provide follow-up documentation.

Map Proposal Presentations

10. In the collective letter, we noted that we believe providing individuals and community groups the opportunity to present their mapping proposals benefits the CCRC by showing alternative mapping ideas and should always be part of the redistricting process. Yet, the process for the public map proposal meetings was unclear and could use improvement. Organizations were given different numbers of slots and different lengths of time, despite presenting similar levels of content. Additionally, people presenting statewide map proposals across multiple levels of government should receive more time for map presentations. However, the draft report acknowledges the overall need to provide equal treatment of groups presenting similar levels and types of input, without referring to the specific challenges of the differing numbers of time slots and lengths of time. Also, while it generally indicates the importance of ensuring that groups presenting plans have adequate time for coherent presentations, it does not specifically mention providing more time to statewide map proposals across multiple levels of government. We urge the Commission to provide more recommendations regarding improvements in the process for map proposal presentations that specifically address the challenges and potential solutions set forth in the collective letter.

Data management for CoI input and public map proposals

11. In the collective letter, we noted the data management for CoI input and public map proposals should be improved. The CCRC should post CoI input relatively quickly, whether received through email, feedback form, verbal comment, or other methods. CoI maps and public map proposals were difficult to find and at times appeared to have been lost. Some of our organizations had to submit CoIs multiple times. We recommend that the CCRC create a CoI map repository that is easily searchable by both the CCRC and the public. The CCRC should then use the CoI maps during line-drawing. The draft report recommends ensuring that all public input about communities and maps – no matter how it is received – should be accessible in a single place and available no more than 24 hours after receipt. However, we suggest that the CCRC clarify whether ensuring public input is "accessible" would incorporate a searchable CoI map repository as recommended above.

Transcripts

12. In the collective letter, we encourage the CCRC to significantly improve transcript quality and availability. We found transcripts of some, but not for all speakers. We suggest that all speech should be live-transcribed through automation. However, the draft report acknowledges the difficulty of providing timely transcripts, and notes that this was a "vendor issue." While this acknowledgment suggests that this functionality should be improved, we urge the CCRC to specifically recommend an approach such as live-transcription through automation.

Live-stream video hearings functionality

13. In the collective letter, we also encourage the CCRC to improve the functionality available on the live-stream video of hearings. The video should be navigable, aided by transcription. At a minimum, viewers of the video stream should be able to move backward and forward through the portions of the meeting that have already transpired. Additionally, the video transcription system should allow viewers to search for keywords and use them to navigate back in time in the video feed. The Washington State Redistricting Commission used such a system. However, while the draft report acknowledges that video recordings are the "official record" of the meetings, it should also make specific recommendations about making them navigable or searchable to aid viewers.

Mapping Meetings - Public Input

14. In the collective letter, we applaud the CCRC for providing the public with multiple ways to submit feedback regarding mapping proposals. There should always be a way to submit comments in writing and orally without attending a mapping session in person. The pandemic created unique opportunities for the CCRC to experiment with virtual hearings and meetings. We believe the virtual mapping sessions increased the ability for the general public to participate. If virtual hearings and meetings are not permitted after the pandemic is over, we encourage the next CCRC to develop a way for the public to monitor and submit comments remotely. The draft report acknowledges the importance of the opportunity for members of the public to submit feedback on the maps and notes that public input should be accessible in a single location and in a timely way after receipt. We note that the CCRC generally supports remote meetings of the Commission. We urge the CCRC to include a stronger recommendation or statement of support for ensuring that the public can monitor and submit comments remotely.

Public Comment Sign-Up Process

15. In the collective letter, we noted the public comment sign-up process and availability of interpreter services were different at various times, which created confusion. For the scheduled draft maps feedback sessions, some organizations assisted community members by signing up using one organization's email address. Nothing in the sign-up process suggested this would not be allowed, yet those community members lost their appointments. It is recommended that (a) all sign-up rules should be clearly stated in the sign-up process, (b) the CCRC should allow others to sign up for those without email addresses, (c) the appointment form should allow those who are signing up for others to indicate that they are signing up for a community member. The form should include whether the person making the appointment works for an organization, a political party, or a politician. While the draft report includes general recommendations about providing interpretation services and addressing difficulties in signing-up for appointments, it does not address the foregoing specific issues concerning the public sign-up rules, the confusion about the availability of interpreters, and modifications to the questionnaire form. We urge the Commission to include the recommendations we set forth above in the draft report.

In addition, the public comment sign-up form was not available in Spanish from the onset, and it took weeks into the sign-up process to get the on-line form translated. The draft report should recommend ensuring that the public comment sign-up form is translated prior to the launch of the sign-up and include a translated confirmation e-mail with the instructions in Spanish as well.

Language Access

16. Although not reflected in the collective letter, we would like to acknowledge the Commission for addressing the language access planning that considered the diversity of our state in the draft report. We agree with the draft report's recommendation that translations of all informational materials, the website, and the CoI tool content should be completed prior to the launch of every phase of the public outreach activities. We also believe that language support should be provided at every stage of the CCRC process, including having in place Spanish interpretation from the very first meeting of the first eight Commissioners. In addition, we would like to emphasize our support for the draft report recommendation to provide simultaneous Spanish interpretation of all business and public input meetings, as well as having interpreters for some number of additional languages on call.