

**Los Angeles County Citizens Redistricting Commission (CRC)  
Public Comment Received for the February 10, 2021, Regular Meeting**

**From:** Kayla Koerting <[Kayla@vica.com](mailto:Kayla@vica.com)>  
**Sent:** Monday, February 8, 2021 12:49 PM  
**To:** CommServ <[CommServ@bos.lacounty.gov](mailto:CommServ@bos.lacounty.gov)>  
**Cc:** Stuart Waldman <[stuart@vica.com](mailto:stuart@vica.com)>  
**Subject:** Los Angeles County Redistricting Plans

February 8, 2021

Los Angeles County Citizens Redistricting Commission  
P.O. Box 56447  
Sherman Oaks, CA 91413

**SUBJECT: Los Angeles County Redistricting Plans**

Dear Commissioners,

The Valley Industry and Commerce Association (VICA) looks forward to working with you regarding 2021 Redistricting Commission for Los Angeles County. The San Fernando Valley is a unique economically vibrant and ethnically diverse community with distinct needs from the Westside to downtown Los Angeles. The 1.8 million residents of the Valley come from across the globe and work in a myriad of industries, but hold a common identity as part of the San Fernando Valley.

Bound by the Santa Susana Mountains to the north and west, Mulholland Drive to the south, and the San Gabriel Mountains to the east, the Valley is a distinct geographic area that cannot simply be piecemealed into majority Westside and downtown Los Angeles districts. The cities of Burbank, Calabasas, Glendale, Hidden Hills, and San Fernando must be respected as unique municipalities that share these geographic boundaries.

Recognition of the Valley's individuality is far from new. The Los Angeles Unified School District and Los Angeles Police Department already divide the Valley into its own bloc. More than 400 nonprofit groups recognize the Valley's regional individuality and distinguish our communities and cities from the southern City of Los Angeles.

VICA supports the following principles for the Los Angeles County's 2021 Redistricting Process:

1. The San Fernando Valley is a geographical area roughly bound by the Santa Susana Mountains to the north and west, the Mulholland Drive to the south, and the San Gabriel Mountains to the east. It lies wholly within Los Angeles County;
2. The redistricting process of the County districts is a public process, and VICA must engage in this process in order to advance our membership's goals and improve representation in the San Fernando Valley;
3. VICA supports the creation of districts that maximize the connection that legislators have with the San Fernando Valley;

4. Our community is best served by a redistricting that maximized the number of districts that are either wholly within the Valley or in which the Valley is the most influential voter bloc;
5. To ensure full and adequate representation for the San Fernando Valley, we support Valley-only districts;
6. If it is necessary to merge one Valley seat with areas outside of the Valley, the preference is to have a minimum of 50% of that district within the San Fernando Valley;
7. VICA's goals for redistricting are non-partisan and are only to be shaped by the interest of maximizing representation and advancing goals of Valley businesses and residents;
8. All recognized communities should be kept together as part of compact and contiguous districts which shall recognize geographic features and natural boundaries.

Thank you for your consideration. We look forward to your support for plans that respect the distinctive communities of the San Fernando Valley.

Sincerely,



Brad Rosenheim  
VICA Chair



Stuart Waldman  
VICA President



**Sent Via Email**

February 8, 2021

To: County of Los Angeles Citizens Redistricting Commission  
[CommServ@bos.lacounty.gov](mailto:CommServ@bos.lacounty.gov)

**Re: Recommendations For Commission Next Steps**

Dear Commissioners:

Congratulations to all of you on your selection to the Los Angeles County Independent Redistricting Commission. You are now entrusted with important responsibilities that will shape Los Angeles’ democracy for a decade. Our organizations include good government, civil rights, advocacy, and ethnic-based direct service organizations working together to ensure a redistricting process that engages and reflects the diversity and changing face of Los Angeles County. We look forward to working with all of you over the coming year as you do the important work of drawing a new district map for the county. We write today with recommendations to approaching your work over the next several months as you ramp up and make important decisions relating to staffing, your public outreach plan, and how you will conduct a transparent and inclusive redistricting process.

Many of us were heavily engaged in the 2020 Census and in the 2010 state and local redistricting processes. For the past two years, we worked collaboratively with the California State Auditor’s Office, the Los Angeles County Registrar-Recorder/County Clerk, and relevant stakeholders to encourage broad participation in their independent commission application and selection processes. The following recommendations are based on that work and expertise, as well as our ongoing work to engage historically underrepresented communities in our democracy.

**Arm Yourself with the Information and Staff You Need to Effectively Plan the Process:**

To ensure you are effectively prepared and supported for the work ahead, we recommend that you learn from other commissions, research and get the training you need, and independently lead the selection of all consultants.

*We cannot stress enough the importance of doing your work in an independent manner.* While county staff will support your work, it is you, the Commission, that should lead it and make critical decisions about how you will execute a fair and inclusive line-drawing process. This includes taking time to write and direct the public outreach plan that takes into consideration feedback from issue area experts, community advocates, and other stakeholders, as well as developing your own training schedule that meets your needs.

Fortunately, the state legislature extended the deadline for you to adopt a final map to December 15, 2021. Cal. Elec. Code Section 21622(a)(2). This gives four additional months to get the training you need and to engage experts to inform your thinking about how you want to conduct the county's first independent redistricting process. We recommend the following initial steps:

- 1) ***Learn from other commissions.*** The task before you can be daunting, but fortunately, you do not have to reinvent the wheel. There are state and local commissions that have developed best practices for getting their work started and ensuring they have the training and staff they need to do their work effectively. The 2010 State Citizens Redistricting Commission (CRC) made recommendations in a written [report](#) based on their experience as the first state citizens redistricting commission. The 2020 state CRC is already making decisions about how they will conduct their work and there is a tremendous amount of material that might be helpful to you on their [website](#). Additionally, the City of San Diego has had independent commissions for several redistricting cycles. We encourage you to reach out to current and former state and local commissioners and invite them to speak to you about what went well during their onboarding, training, and redistricting processes, and what they would have done differently.
- 2) ***Research and get the training you need.*** Ask other state and local commissions what training they found helpful and review the training the state CRC received last fall. Many of those same experts are available to you and we are happy to introduce you to them. At minimum, you should arrange to watch and discuss the videos of the trainings the state CRC received on Redistricting 101, the Voting Rights Act, California's diverse demographics, Communities of Interest, and the Statewide Database. The training curriculums planned for the commissions in the [County of San Diego](#) and [City of Long Beach](#) suggest additional topics that the LA County CRC should consider, including Elections Code 21500-21509 and 21530-21535, demographics and geography of LA County, redistricting software and tools, best independent redistricting practices, public outreach and engagement, language access, disability access, and more. This information will inform the Commission about its responsibilities under state and federal law, and best practices for going above and beyond the requirements to maximize public engagement and create an accessible, inclusive redistricting process. Getting this training is critical and will give you the confidence and information you need to make important decisions, including decisions about staffing and consultants, the Commission's public outreach and engagement plan, how to incorporate community input in the final maps, and how to carry out a fair, transparent, and lawful redistricting process.

In addition to training on redistricting law, demographics, and Census data, the state CRC brought in panels of experts on community outreach to underrepresented communities to inform its thinking about how to engage those communities in the redistricting process. Many of those organizations work in or are based in Los Angeles, and we would be happy to assist you with identifying state and local experts on engaging hard to reach communities, language accessibility, and disability access. We know the state CRC has found these panels extremely helpful to its outreach planning.

- 3) ***Be intentional and transparent when hiring consultants.*** Again, you have a few months before Census data are released. Take the time needed to learn about line drawing, demographics, the Voting Rights Act and applicable law, and community engagement strategies before soliciting proposals from line drawers and outreach consultants. You cannot determine what you will need from and be looking for in a consultant until you have researched and discussed the kind of process you want to lead. The state CRC was seated in August and is still in the process of selecting a contract for its line drawing consultant.

Moreover, make sure that the selection of important consultants is transparent and is done by the full Commission. We appreciate the tremendous efforts the County and the Commission staff has already

undertaken to ensure the CRC is fully seated, and we understand the County still has a role to play in supporting the CRC as it conducts the redistricting process. However, the CRC should make its own hiring decisions when it comes to key roles, including an independent determination of the positions that the CRC needs and the job descriptions and Request for Proposals (RFPs) for those positions. These roles will play a critical role in the redistricting process and will shape the commission's engagement with the public and the final maps that will be in place for the next decade.

While you may need a subcommittee to do an initial review and summary of proposals, independent commissions historically make the hiring of the line drawer—one of the most critical consultants you will hire—a transparent and public process. Many do the same for their outreach consultants. For example, the RFP should be posted, and the public should be offered the opportunity to make a comment before it is finalized. In addition, proposals received in response to RFPs should be made available to the public, and interviews for line drawers and voting rights counsel should be conducted during public meetings. Finally, the discussion and decision about the awarding of the contract should be done in a public meeting with the opportunity for public participation and comment. There is significant value in having the CRC discuss the qualifications and requirements for these roles in a public forum. Not only will this allow the Commission to build consensus about its values and priorities, but it also will allow the public to observe and engage with the CRC as it makes critical determinations about its operations, hiring, and the public mapping process, creating more buy-in and trust in the Commission's work. This process will also honor the Commission's purpose, which is to be independent, transparent, and inclusive.

### **Develop a Strong Infrastructure to Carry Out Your Work:**

With so many important decisions ahead of you, a strong infrastructure is crucial to supporting your work. For a harmonious and efficient redistricting process that builds trust and credibility with the communities on whose behalf you serve, we recommend that you form subcommittees and initiate team building opportunities amongst yourselves.

- 1) ***Use subcommittees to get your work done.*** You have many important decisions to make and business to attend to as you begin your work. We recommend you create subcommittees to carry out some of this work. As a reference, both the state CRC and the City of San Diego have used subcommittees to get important work done. For example, the City of San Diego Redistricting Commission currently has three subcommittees: budget, bylaws, and hiring. With a wider jurisdiction, the state CRC has a variety of subcommittees, some of which may be useful to consider. A list of their current subcommittees can be found on page 3 of a [previous meeting agenda](#), including a subcommittee dedicated to Voting Rights Act compliance. Given the preeminence of Voting Rights Act compliance in the redistricting process, we urge you to establish a subcommittee that is tasked with ensuring you get the ongoing training and consultants needed to ensure your understanding and compliance.
- 2) ***Engage in team building.*** You will need to work very closely together over the coming year and potentially thereafter if your maps are challenged. At times, you will have robust discussions and be faced with difficult decisions about where district boundaries will fall. We believe that you will all be better Commissioners individually, and a better Commission as a whole, if you spend some time now getting to know each other and your individual work and communication styles. We suggest taking time to do some deliberate team-building now, especially with the current reality of Covid-19 and remote meetings. This could take the form of a series of virtual lunches, dinners, or coffees. You could also explore a virtual team-building exercise. Note that, depending on the team building activities, gatherings of Commissioners may need to comply with the public access requirements of the Brown Act. *See* Gov't Code §54952.2 (defining a "meeting" for Brown Act purposes). We hope that you plan this as part of your ongoing activities during your time as a Commission.

Our thanks to all of you for being willing to do this important work for the people of Los Angeles County and ensuring a fair, transparent, and independent process. Your public service is sincerely appreciated. Again, we are available to speak to any of the above issues or to recommend experts who can inform your important thinking over the next few months. We look forward to working with you over the upcoming year. If you have any questions, please do not hesitate to contact any of the undersigned organizations.

Sincerely,

Angelica Salas  
Executive Director  
Coalition for Humane Immigrant Rights  
[kdiaz@chirla.org](mailto:kdiaz@chirla.org)

Daniel Jeon  
Staff Attorney  
Asian Americans Advancing Justice-Los Angeles  
[djeon@advancingjustice-la.org](mailto:djeon@advancingjustice-la.org)

Fatima Malik  
President  
League of Women Voters of Los Angeles County  
[fmalik2085@gmail.com](mailto:fmalik2085@gmail.com)

John Dobard  
Director of Political Voice  
Advancement Project California  
[azarate@advanceproj.org](mailto:azarate@advanceproj.org)

Julia A. Gomez  
Staff Attorney  
ACLU of Southern California  
[jgomez@clusocal.org](mailto:jgomez@clusocal.org)

Kiyana Asemanfar  
Program Manager  
California Common Cause  
[kiyana@commoncause.org](mailto:kiyana@commoncause.org)