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**To:** [lwfresno.redistricting@gmail.com](mailto:lwfresno.redistricting@gmail.com)  
**Bcc:** [Eropkin, Rebekah](#); [Douglas Johnson](#); [Jeff Tilton](#)  
**Subject:** FW: Redistricting  
**Date:** Wednesday, October 20, 2021 2:03:00 PM  
**Attachments:** [Mapping Playbook - v.3.pdf](#)  
[image001.png](#)

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Ms. Goldman,

Thank you for providing us with the list of concerns from the League of Women Voters. Our response to the concerns are below in “red”.

Sincerely,



**John R. Thompson** | **Assistant Director**  
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**From:** lwvfresno redistricting <[lwfresno.redistricting@gmail.com](mailto:lwfresno.redistricting@gmail.com)>  
**Sent:** Tuesday, October 19, 2021 1:06 PM  
**To:** Thompson, John R. <[jthompson@fresnocountyca.gov](mailto:jthompson@fresnocountyca.gov)>  
**Subject:** Redistricting

**CAUTION!!! - EXTERNAL EMAIL - THINK BEFORE YOU CLICK**

Hi John,

The League of Women Voters has attended most county redistricting meetings either in person and/or by Zoom. We continue to have some concerns with the redistricting process as listed below.

1. The note taking at the COI meetings has not adequately captured the essence of the verbal COI input. As such it will be difficult for commissioners to analyze the input unless they listen to all the recordings. What will be the process for analyzing COI input?

**Response: The Advisory Redistricting Commissioners have been asked to carefully review the COI input and make comments on each map as to any COIs that they feel may be affected by a proposed map.**

2. While we have been impressed with the number of maps submitted,

many of them demonstrate little variance from current districts. Some of the maps have been submitted anonymously without any supporting information. How will commissioners evaluate the maps without supporting documentation and a determination of the rationale behind the boundaries?

**Response: The Advisory Redistricting Commission will evaluate each map based on the Fair Maps Act AB849 and Local Redistricting (AB1276).**

4. Beyond federal and state criteria, what other criteria will be utilized to analyze the submitted maps? The state CRC has a mapping playbook, attached below, which could be beneficial for NDC and the commissioners to look at.

**Response: Thank you for the copy of the CRC mapping playbook, I will forward this material to our Demographer at NDC.**

5. The high volume of maps presented to commissioners would make it difficult for them to analyze all of them in depth in only one day. Will commissioners be given the option to request an additional day(s)?

**Response: The Advisory Redistricting Commissioners were provided the NDC evaluated maps on Friday, October 15, so that they would have six days to review the draft maps individually, prior to the October 21, 2021 Commission Hearing. Unfortunately due to the delay in Census data, the availability of the consultant, and the regularly scheduled November 2, 2021 Board of Supervisors public hearing, there is no opportunity beyond October 21, 2021 to hold an additional meeting.**

Thank you for your time.

Sincerely,

Sue Goldman

Director of Voter Services

League of Women Voters Fresno

# Mapping Playbook

2020 CRC - **DRAFT 3.1 (2021.10.06)**

*Note: the full Playbook consists of this document plus two attachments:  
Attachment #1: “Consideration of Current District Boundaries” (see II.D.3.b)  
Attachment #2: “Line Drawing Phases Plan” (see IV)*

- I. **Data:** All mapping will be based on Statewide Database’s Official 2021 California Redistricting Database, consisting of:
  - A. Adjusted P.L. 94-171 Redistricting Data with state incarcerated persons reallocated and federal incarcerated persons removed
  - B. Electoral datasets (Voter Reg. and Statement of Vote) on 2020 census blocks
  - C. Citizen Voting Age Population tabulations on 2020 census block geography
  
- II. **Ranked Statutory Criteria** (California Constitution, Article XXI, § 2):

The following six criteria (A-F) are listed in order of priority. Some include related but non-statutory considerations. Lower-priority criteria only apply to the extent that they do not conflict with higher-priority criteria.

  - A. **Equal Population:**
    1. Assembly, Senate, and BOE: as close to +/- 0% as possible but with deviation permitted by law (“reasonably equal population”)
    2. Congressional: as close to +/- 0% as possible (“population equality as nearly as is practicable”)
  
  - B. **VRA compliance:** Fulfill all Section 2 requirements
  
  - C. **Contiguity:** Observe absolutely, with appropriate consideration for islands and permanent water crossings; never use point contiguity
  
  - D. **Cities, Counties, a City and County, Local Neighborhoods and Local Communities of Interest** (note that the below sub-criteria of 1. Governmental Units and 2. Communities of Interest are not ranked within this criterion):
    1. Governmental Units: The statutory requirement is to respect the integrity of “any city, county, city and county, local neighborhood, [and] local community of interest” (note that “local neighborhood” is not limited to an officially designated neighborhood)
    2. Communities of Interest
      - a) The statutory requirement is to keep together, to the extent possible, each community of interest, which is a contiguous population that shares common social and economic interests that should be included within a single district for purposes of its effective and fair representation

- b) By statute, defining communities of interest excludes any consideration of relationships with political parties, incumbents or political candidates
- c) Where COI submissions conflict, generally give greater weight to those that:
  - (1) Aid in satisfying other statutory criteria, especially higher-ranked ones
  - (2) Are more relevant to the district type being considered (e.g., a COI focused on a national park might bear more weight for a congressional district than an Assembly one)
  - (3) Seem to represent a larger segment of a community
  - (4) More closely fit the statutory definition of a COI
  - (5) Are given by someone located in that COI
- d) When an individual COI input submission is unclear or inconsistent with itself, generally give greater weight to the part of that individual submission that is more clear, specific, and central
- e) Give due but carefully considered weight to COI input given via official resolutions by elected bodies
- f) Give due but carefully considered weight to input by organizations; be aware of which interests a given organization does and does not represent, and be aware of how locally representative it actually is (or not)
- g) It is appropriate to consider COIs known to Commissioners through data or other documented evidence even if those communities have not submitted COI input
- h) Sheer quantity of input on a given COI is difficult to weigh; COI submissions are aids to identify and define COIs; therefore, quantities (whether many or few) should be duly considered but are not decisive
- i) In cases of multiple substantially identical COI input submissions that appear “scripted,” generally evaluate the COI on its own merits, noting the above considerations about quantity of input; do not discount such input merely for seeming “scripted”
- j) Be open to ways a heterogeneous region may nevertheless “share common social and economic interests”
- k) Consider racially framed COI input in the context of all other traditional redistricting criteria, so that race is never a sole or predominating factor (except as needed for VRA compliance)
- l) Give appropriate care and consideration to the possibilities of covert motivations and sources of COI input; factually questionable input can be checked or ignored; use a critical lens to discern attempts to reverse engineer districts; always look for actual evidence
- m) If testimony alone is insufficient to fully define a given COI, it may be helpful to seek current and valid demographic, economic, historic, land-use, and other data (e.g., via reports written by local

communities about their own issues); and perhaps make in-person visits

3. Areas that are not specified by statute but overlap with the statutory Government units and Communities of Interest include:
  - a) Unincorporated communities and Census Designated Places (which are typically larger than a neighborhood and sometimes as large as a small city)
  - b) Current state election districts, which will be considered per Attachment #1, "Consideration of Current District Boundaries"

E. **Compactness:** Not bypassing nearby areas of population for distant ones

F. **Nesting:** Two whole, complete, adjacent Assembly districts per Senate district; ten whole, complete, adjacent Senate districts per Board of Equalization district

G. **Exclusions:**

1. We will not consider the place of residence of any office holder or candidate
2. We will not or draw any district with the intention of favoring or disfavoring any officeholder, candidate, or party

III. **General Mapping Sequence:**

- A. Areas with potential/probable VRA districts (Assembly, Senate, Congressional)
- B. Assembly plan
- C. Senate plan
- D. Board of Equalization plan
- E. Congressional plan

As to each plan, the Commission will start with more densely populated areas, such as those in Los Angeles County, and will move towards comparatively less populated areas.

IV. **Mapping Process:** As set out in Attachment #2, "Line Drawing Phases Plan"

V. **Some General Principles:**

- A. Document all decisions and their reasons, including incremental (and not just final) ones
- B. Consult the most current data available, remembering that the 2011 maps are a decade old
- C. "Share the Gain & Pain"--spread the costs and benefits of mapping decisions; e.g., if a city must be split in one plan, consider keeping it whole in another plan
- D. Be open to resolving similar issues in different places in different ways
- E. Remember: "The cleanest option is not always the best" - Justin Levitt
- F. Remember: we are neither in the incumbent protection business nor in the wrecking ball business

**VI. Key Differences Relative to 2010 CRC:**

When drawing lessons from the 2010 CRC's work, note these developments for 2020:

- A. *Globally*: the COVID-19 pandemic and all its effects, including:
  - 1. No in-person public input meetings; all public input via remote means, with broadband opportunities and challenges
  - 2. No statewide in-person Commission travel; no in-person Commissioner attendance at others' gatherings
  - 3. Californians burdened by job loss/change, homeschooling, a further worsening housing crisis, business cutbacks and closures
  - 4. Dramatic increases in unhoused individuals and families
- B. *Nationally*: A contentious 2020 election; the events of January 6, 2021 in Washington, D.C.; further polarization in politics generally; the heightened place of social justice as a national issue (including Black Lives Matter and Stop AAPI Hate); further refugee crises and immigration debates
- C. *Statewide*: Massive wildfires, the 2021 Gubernatorial Recall election
- D. 2020 Census delay, prolonged mapping deadline uncertainties, time and effort to request an extension, critical public comment period during Nov-Dec holidays
- E. Inactivation of §5 of the Voting Rights Act (via the 2013 *Shelby* ruling)
- F. Specific operational and policy CRC changes:
  - 1. Reallocation of individuals in state prisons to their last known addresses
  - 2. Removal of individuals in federal prisons
  - 3. Longer public outreach and education phase than 2010
  - 4. Fully functional, multilingual online Communities of Interest mapping tool
  - 5. Fully functional online + QGIS district mapping tool
  - 6. Full, publicly accessible public input database
  - 7. Longer period to hire staff and larger staff overall than 2010
- G. Having the example and inspiration of a successful prior Commission