

## Communication from Public

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**Comments for Public Posting:** Please see attached from the League of Women Voters of Greater Los Angeles.



October 4, 2023

Comments from the League of Women Voters of Greater Los Angeles  
To the Report of the Chief Legislative Analyst dated September 29, 2023

The League of Women Voters of Greater Los Angeles (“LWVGLA”) offers the following recommendations to the Los Angeles City Council Ad Hoc Governance Reform Committee. Our comments mirror the outline used in the Chief Legislative Analyst's Report dated September 29, 2023.

**Number of Council Districts (A.1, A.7, and A.8)** This section sets forth four (4) issues under consideration concerning options to increase the City Council’s Size. The third calls upon the committee to “[i]dentify potential changes to appointment authorities.” We request that this option be deleted. There is no reason to disrupt our election cycle.

**Number of Commissioners (C.2)** This section would designate 17 Commissioners with 8 alternate Commissioners. LWVGLA has seen Commissions work successfully with 14 members and strongly believes that appointing 8 alternate Commissioners is unnecessary. The CLA report suggests that all Commissioners, including alternates, have the opportunity to deliberate at every hearing, even though the 8 alternates have no vote. Coordinating 25 schedules, plus staff schedules, will be a difficult challenge. But, more importantly, each Commissioner must be given the opportunity to speak on each issue before the Commission. Deliberation among 25 people is unwieldy. A more appropriate number of alternates would be between 2 and 4.

## **Commissioner Qualifications, Responsibilities, and Restrictions (D.1.a-f)**

- The CLA report sets forth 6 qualifications to be appointed to the Commission. LWVGLA proposes a seventh (**D.1.g**): Qualified applicants “Shall demonstrate the ability to analyze complex data, collaborative skills, and experience in civic engagement.”
- Section **D.3.a.i** states that a Commissioner shall be ineligible to be a candidate for any City elective office and/or City Council district from which they were involved in drawing the District boundaries “unless more than 5 years have elapsed from the date of their appointment . . .” LWVGLA strongly believes that the number of years be increased to 10 because if a person who helped draw council district lines, then later ran for office in a district he or she helped create, it might give rise to the impression of undue influence. However, if the ban were extended to 10 years, when the Commission’s term is over, there could be no suspicion of impropriety.
- Section **D.3.b.** prohibits Commissioners from serving in various City positions “[f]or a period of 4 years beginning from the date of their appointment.” Once again, LWVGLA believes that in order to maintain the public’s trust in the redistricting process, that amount of time must be lengthened to 10 years.

## **Commission Selection Process**

- (**E.4**) This section provides that “[o]nce the Pool of Applicants has been established, the City Clerk shall randomly select 150 names from the pool to become candidates for Commissioner.” This is unnecessary and possibly even unfair. The purpose of the selection process is to engage the public in the fair redrawing of district boundaries. The most important part of the process is the selection of a fair and balanced Commission. The application process will be strenuous; even filling it out will require a considerable amount of time. Discarding all but 150 of them may be disheartening to the applicants, and may deprive the Commission of potential talent. Under no circumstances should an application be discarded without cause.
- (**E.5.b.ii.1-7**) This section addresses Diversity Selection. It states that “[s]election shall be made in a manner to balance the diversity of the Commission,” and provides 7 criteria below. We believe that this sentence alone is adequate. The

numerical listing of the 7 criteria is unnecessary and possibly legally impermissible.

**Redistricting Criteria (F.2)** The report states that additional redistricting criteria must include “consideration of the community and cultural association with economic and cultural landmarks and resources.” LWVGLA stands in strong opposition to this criterion because it may be perceived as a euphemism for incumbency protection. In addition, we request that this section specifically ban incumbency protection and gerrymandering.

### **Public Meetings and Public Comment**

- **(G.1)** This section encourages public participation in the process. One such method is to give grants to local community organizations to do outreach. LWVGLA believes that if the Commission gives such grants to reach out to and educate underrepresented and non-English speaking communities, guidelines for accountability should be required.
- **(G.4)** The report allows only 5-days’ notice for any public hearings or workshops. We believe that is not sufficient time for members of the public to arrange their schedules and transportation needs to attend the hearings. We LWVGLA believe that no less than 14-days’ notice would be sufficient (except for the provision for 3-days’ notice if within 28 days of the deadline to adopt boundaries).
- **(G.5)** This section states: “The Commission should consider public testimony in their deliberations, as well as any full or partial maps provided in writing and at public hearings and meetings.” We strongly believe that the word “should” be replaced with “**shall**.” The very purpose of this Commission is to ascertain public input and opinions on Council district boundaries. It must be imperative, not optional, for the Commission to consider it. In addition, the use of the word “should” is at odds with the other paragraphs in that section. Section G contains 10 paragraphs. Nine of them use the word “shall,” which requires the Commission to act in accordance with those requirements. Notably, only number 5, regarding consideration of public input, uses the word “should.” LWVGLA believes that the language used in this section be made consistent and use “shall” throughout.
- **(G.8)** This section provides for the Commission to create and implement an Accessibility Plan for the disabled. Online hearings are essential to enabling this segment of the population to participate in the redistricting process. In fact, online hearings are

convenient for almost everyone and adding them to the process will greatly enhance public participation.

- **(G.9)** This section states that the “Commission shall allow elected officials to provide public comment.” That statement is very broad, and LWVGLA believes that some clarification is necessary. We suggest that the following language be included: “For purposes of providing testimony, elected officials shall be subject to the same public comment procedures as members of the public.”
- **(G.10)** This section addresses the time and place of public meetings. It states that “a portion of the meetings [be] held evenings after 6pm or weekends . . .” LWVGLA suggests that the word “portion” be changed to “**majority**.” Many, if not most, adults work during business hours and are therefore unable to take time off to attend daytime hearings. Also, to increase the ease of public participation, we suggest adding the following sentence: “Members of the public shall be able to submit testimony and maps online.”

### **Records and Data (I)**

- **(I.2)** This section requires the Commission to comply with the Brown Act and other open meeting laws, which require at least 3-days’ notice before public meetings. However, 3-days’ notice is a floor, not a ceiling. LWVGLA recommends changing the notice period to 14 days’ (except for the provision for 3-days’ notice if within 28 days of the deadline to adopt boundaries).
- **(I.3)** This section states that: “To the greatest extent practicable, all public meetings of the Commission and its subcommittees shall be audio and video recorded.” This section does not go far enough. The clause “[T]o the greatest extent practicable” should be deleted. Current technology makes capturing meetings on audio and video eminently practical. This section should read: “All public meetings of the Commission and its subcommittees shall be audio and/or video recorded and made available to the public online.”

**Funding (J.1.)** This section requires that the Commission receive “sufficient” funding. LWVGLA suggests the text be made more explicit to include, “The current Commission budget shall be determined by adding Cost of Living Adjustment to the previous Commission budget.”

## **Administrative and Operational Issues**

- **(K.8)** This section provides the Commission with the authority to choose their own legal counsel. LWVGLA suggests expanding this section to read: “Provide the Commission with the authority to choose their legal and Voting Rights Acts counsel.”
- **(K.9)** provides that “Commissioners shall be compensated in a manner described in the Administrative Code.” LWVGLA suggests greater specificity. The section should be amended to read: “Commissioners shall be compensated per diem.”

**City Data Bureau (L)** This section creates a City Data Bureau. LWVGLA recommends that the City Data Bureau operate as an independent body.

Thank you very much for your time and consideration of our positions.

Sincerely,

Mona Field  
President  
League of Women Voters of Greater Los Angeles