

## Communication from Public

**Name:** Alejandra Ponce de Leon

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**Council File No:** 22-1196-S2

**Comments for Public Posting:** Dear Council President Krekorian and members of the Ad Hoc Committee on Governance Reform, Attached you will find a letter from OUR LA sharing our recommendations regarding the City Attorney's draft language for the City IRC, as well as recommendations on the CLA's report on the LAUSD IRC. Thank you, Alejandra Ponce de Leon

April 17, 2024

Los Angeles City Council  
Ad Hoc Committee on City Governance Reform  
200 North Spring Street  
Los Angeles, CA 90012

**RE: City Independent Redistricting Commission - CF 24-1100-S6  
LAUSD Independent Redistricting Commission - CF 22-1196-S2**

Dear Council President Paul Krekorian and Members of the Ad Hoc Committee on City Governance Reform:

Congratulations on reaching two key milestones in this journey to establish an Independent Redistricting Commission (IRC) for both the City and LAUSD: the City Attorney's draft City IRC Charter and Administrative Code language, and the Chief Legislative Analyst's (CLA) report proposing the design of the LAUSD IRC. Both provide strong language that speaks to many of OUR LA's previous recommendations, which were developed in partnership with the low-income and BIPOC communities we serve. In particular, we are excited by the provision of the City IRC draft language which removes the requirement to be a registered voter to be on the commission. This is a significant step forward for thousands of Angeleno residents and immigrants who do not vote, yet make Los Angeles their home, to be welcomed and included on the City IRC. Additionally, we applaud the recommendation that there be 14 commissioners serving on the LAUSD IRC, with at least one representing each of the 7 LAUSD districts. Further, the requirement to include an outreach and education program to increase awareness of the commission application process, especially for underserved communities and conducted in multiple languages, is a major step in increasing the overall participation in both IRCs for low-income, BIPOC communities.

While we commend many aspects of the City Attorney's draft Charter and Administrative Code language and the CLA's report, **changes to the language are critically needed to ensure we have fully inclusive and representative IRCs for the City and LAUSD.** We therefore, urge you to include the following language recommendations that align with the needs, vision, and priorities of LA's underrepresented and low-income BIPOC communities:

### **City IRC**

#### **Charter Language Recommendations**

- **Eliminate the creation of a Commission Selection Pool limited to 150 candidates:** Section 483(f) in the draft Charter language states: *Following the public review period, the City Ethics Commission shall evaluate the applications of the individuals in the applicant pool to identify 150 individuals who satisfy the eligibility requirements specified*

*in subsections (a) through (d) of Section 482 and who shall be included in the Commission Selection Pool.* This language establishes an artificial cap to the pool of eligible applicants and unfairly sets up the Ethics Commission to fail by requiring them to narrow down the pool of candidates without guidelines. This risks implicit bias in their approach and decision-making, which would exacerbate disparities in representation and opportunity for low-income Angelenos and communities of color. All candidates that meet the eligibility requirements should have the opportunity to partake in the two-step selection process.

- **Strengthen access to translated materials:** Charter Section 485(d) says: *The Commission shall provide materials in the languages required by federal and state law as provided by ordinance.* We recommend it should say "**AND** as provided by ordinance" in order to ensure inclusion of all categories of languages that the Commission is required to translate materials into.
- **Ensure a strong baseline for commissioner compensation:** Charter Section 488(c) states: *Commissioners shall be compensated as provided by ordinance.* While this will be determined closer to the next redistricting cycle, it is important to set in the Charter a baseline level in order to encourage low-income Angelenos to serve. Five states, including California, establish a specific level of compensation for their redistricting commissions. We recommend amending the language to read: "Commissioners shall be compensated as provided by ordinance, **provided that such compensation shall be no less than the rate provided for members of the Citizens Redistricting Commission pursuant to section 8253.5 of the California Government Code.**"
- **Increase Public Oversight of Commissioner Applications:** Charter Section 483(c) says: *...The City Clerk shall monitor application submissions and enhance outreach as reasonably needed to ensure that the applicant pool has a sufficient number of qualified applicants and reasonably reflects the City's diversity.* To further enhance the City Clerk's outreach efforts with underrepresented communities and geographic regions, we recommend modifying the language to read "The City Clerk shall monitor **and make public the demographic data, in real-time, of** application submissions and enhance outreach as reasonably needed to ensure that the applicant pool has a sufficient number of qualified applicants and reasonably reflects the City's diversity." This will enable the public to know, in real-time, which communities are underrepresented in the applicant pool and help generate community-led outreach to increase application submissions for these communities.

#### **Administrative Code Language Recommendations**

- **Expand language interpretation:** Administrative Code Section 2.65(b) says: *The Commission shall provide live translation of Commission meetings in English and Spanish. The Commission shall arrange for the live translation of a public hearing or workshop in an applicable language, as defined in subdivision (b) of section 21110 of the California Elections Code, if a request is made at least 72 hours prior to a hearing or*

*workshop*. This provision requires the Commission to provide interpretation only for those languages spoken by limited English proficient residents who “constitute 3 percent or more of the city’s total population over four years of age.” According to the [U.S. Census Bureau](#) (which traditionally undercounts our communities), no language reaches this threshold except for Spanish. Thus, the IRC would not be required to provide interpretation of a meeting, hearing, or workshop in response to a request from any Angeleno who speaks *any* Asian, Pacific Islander, or indigenous dialect. This excludes some of the very underrepresented and non-English speaking communities that the IRC is directed to engage - communities that speak languages like Armenian, Korean, and Tagalog. The 72 hour requirement is also onerous; for example, Long Beach requires 24 hours advance notice to request interpretation of City Council proceedings. We recommend providing interpretation of any public meeting, hearing, or workshop in response to any request, if the request is made at least one business day prior. Alternatively, if this recommendation is not practicable, we recommend defining an applicable language to include any language that is spoken by at least 1,000 residents in the city, which would capture the top 25 languages spoken in the city as determined by the Census Bureau’s American Community Survey.

- **Expand language translation:** Admin Code Section 2.65(e) says: *The Commission shall provide outreach materials and meeting agendas in the ten most spoken languages in the City, all languages required under the federal Voting Rights Act for City elections, and consistent with any applicable City language access plans. The Commission shall make reasonable efforts to provide all other Commission materials in all languages required under the federal Voting Rights Act for City elections.* Although this provision establishes a threshold for translation that is more inclusive than the provision regarding interpretation, it would still exclude South Asian languages, such as Urdu and Punjabi, and Samoan and Tongan. This acts as a barrier to participation by these communities.
- **Achieve Meaningful & Abundant Community Engagement:** Administrative Code Section 2.65(a) says: *The Commission shall hold public hearings and workshops in a manner that ensures that the public has the opportunity to participate and comment. The Commission shall hold hearings and workshops in such a manner that they are geographically distributed across the City and so that a portion of the meetings are held on evenings after 6 p.m. or weekends in each phase of the redistricting process. Public hearings and workshops are intended to focus on receiving public testimony and presentation of information concerning the redistricting process.* In order to maximize the participation and engagement of all Angelenos, especially underrepresented, low-income, immigrant, and BIPOC communities, language is needed to ensure barriers to participation are eliminated. We recommend modifying the language to read: “The Commission shall hold public hearings and workshops in a manner that **equitably ensures that the public has the opportunity to participate and comment with sufficient resources to provide free childcare, refreshments, and other culturally-relevant resources, and utilizing meeting locations that are welcoming, trusted by community, and accessible through public transportation.** The Commission shall hold hearings and

workshops in such a manner that they are geographically distributed across the City and so that a **majority** of the meetings are held on evenings after 6 p.m. or weekends in each phase of the redistricting process...”

- **Equitably Fund and Resource CBOs:** Administrative Code Section 2.66(e) states: *The Commission shall receive training regarding redistricting and shall provide redistricting training and workshops for the public including by providing grants to community organizations to conduct such training and workshops. The Commission shall follow a grant-making process that ensures transparency, compliance with public contracting procedures, and that is consistent with the ex parte communication rules applicable to the Commission.* To further enhance the ability for CBOs and other trusted messengers, including smaller community groups, that work with underrepresented communities to increase their participation throughout the redistricting process, we recommend modifying the language to read: “The Commission shall receive training regarding redistricting and shall provide redistricting training and workshops for the public including by providing, **and equitably distributing**, grants to community organizations to conduct such training and workshops, **especially those that work with underserved and underrepresented communities.** The Commission shall follow a grant-making process that ensures transparency, compliance with public contracting procedures, **provides inclusive reporting processes for smaller CBOs and nonprofits to comply with**, and that is consistent with the ex parte communication rules applicable to the Commission.
- **Increase Public Notice:** Administrative Code Section 2.65(c) states: *The Commission shall make public the date, time, and location for any public hearing or workshop on the internet at least five business days before the meeting, or at least three days before the meeting if held within 28 days of the deadline to adopt boundaries.* This is not sufficient time for residents, especially low-income, BIPOC, and other underrepresented communities to prepare, study meeting materials, and make plans to attend public hearings or workshops. We recommend that public notice be increased to at least 14 business days, and at least 7 days before the meeting if held 28 days of the deadline to adopt boundaries.

### **LAUSD IRC**

- **Prioritize the selection of youth commissioners:** The proposed program section of the report, titled *Selection Process: Geographical Basis*, states that: *LAUSD representatives have suggested that it may be appropriate to include a requirement that, of the total Commissioners selected, four should be parents or guardians of pupils who attend a school within LAUSD.* While it is absolutely crucial to have the voices of parents/caretakers on the commission, there should likewise be an imperative that a certain number of commissioners be youth. Youth are largely impacted by the LAUSD redistricting process and thus deserve to have their voices heard substantively. While this recommendation could be satisfied by selecting 1 or 2 youth to serve as commissioners, it is very likely that their voices would be overshadowed by the

significantly larger number of adult commissioners. To remedy this, it is critical that councilmembers adopt the recommendation to **center youth by including** 1 youth commissioner from each of the 7 LAUSD districts, leading to a total number of **7 youth commissioners and at least 7 adult commissioners**. This would require lowering the age requirement to 15 years old to enable active LAUSD high school students to apply. It would also entail **selecting youth commissioners, defined as active LAUSD students between the ages of 15-22, across various high school to adult education grade levels, while being inclusive of students who are/were part of foster families, transitional youth, and formerly unhoused youth.**

- **Center youth and parents/caretakers in the public hearing process:** We commend the language in section G. *Public Meetings and Public Comment* that says: *The IRC shall take steps to encourage residents to participate in the redistricting process, including those in underrepresented communities and non-English speaking communities.* While a necessary step, it is crucial that there be language to **prioritize youth and parent/caretaker participation and engagement through the design of public hearings that is accessible, inviting, and culturally relevant.** To support these efforts, we further recommend **the hiring of a Community Outreach Team** to co-develop outreach towards youth, parents/caretakers, and the general public.
- **Increase public notice:** Maximize public engagement and input by providing more advanced notice of public hearings and extending the time for public input of maps to at least 14 business days.

We hope our recommendations that continue to center the vision and needs of BIPOC and low-income Angelenos further strengthen your efforts in creating a national model for an equitable and inclusive IRC for both the City and LAUSD. Please reach out to Alejandra Ponce de León with Catalyst California at [aponcedeleon@catalystcalifornia.org](mailto:aponcedeleon@catalystcalifornia.org) for any additional information or questions.

In community,

