

November 1, 2021

The Honorable Nury Martinez
President, Los Angeles City Council
200 N. Spring Street, Ste 470
Los Angeles, CA 90012

Dear Council President Martinez,

The core purpose of the City of Los Angeles 2021 Redistricting Commission (“LACCRC”, or “the Commission”) was to “independently draw proposed Los Angeles City Council District boundaries based on census data and applicable law that will allocate constituents proportionately while also accounting for the unique histories, experiences and interests of communities, such that those interests will have the highest probability of being served by elected representatives and the City of Los Angeles.”

We, the undersigned, noted irregularities and procedural flaws which we believe undermined that effort. As a consequence, we felt unable to cast favorable votes with our fellow Commissioners in support of Map K2.5 Final on October 21st, 2021. This letter is intended to clarify the position of our dissenting votes and includes some detail as to why we believe the purpose as defined above was not met.

I. Process

- Map K Corrected was first made available on September 26th, giving the public only one day to review and comment prior to the September 27th meeting, and subsequently advanced as the final map only three days later.
- Map K2 was voted on as the only map on September 30th at 9:15pm, prior to the final deadline for map submittals, which was October 1st at 12pm. This meant that other, potentially viable, maps submitted within that 15-hour period were completely excluded from consideration by the Commission.
- The final version was voted forward on September 30th as the only map after less than 4.5 hours of total deliberation by the Commission.
- The Commission’s consultants, Redistricting Partners, created the draft plans that resulted in each of the first 10 maps presented to the Commission for deliberation (Maps A through J). As noted in the majority report (page 17), Map K was created by Commission Staff, unlike the other maps presented. Once it was introduced and reviewed, no other maps were given the same level of consideration as K, despite considerable public support for alternatives.

- In the 2½ weeks after Map K2 was designated as the only map, 2,600 written public comments were received, of which 900 comments were in opposition to K2. Of the 600 comments in support of K2, more than 80% were from, or referenced, Council District 5.
- In total, twelve Neighborhood Councils in the Valley region submitted Community Impact Statements, of which 10 were in opposition to Map K2.5.

II. Lack of Clarity

- There was ongoing confusion about certain districts and assets regarding whether decisions were to be made by the Commission or by City Council. These choices were called “political,” a description which was inconsistently applied.
- Assigning a number to the districts previously labeled A, N and O was described as a “political decision, to be left to City Council,” yet District A was eventually assigned “District 3” despite the fact that fewer than 40% of the current constituency would remain in the new district.
- The decision of where to place USC and Exposition Park was described as “a political one” throughout many discussions at both the Regional Ad Hoc Committee and public meetings; statements were repeatedly made that such a significant change in assets would be most appropriately left to City Council to decide. Despite this, the Commission was asked to vote on this issue on October 20th. The majority of members voted to abstain, indicating a desire to leave the decision to City Council as had previously been discussed. A lack of consensus on this controversial topic was clearly indicated by the final vote of 11-10.

III. Inequitable Representation

- Unlike the thirteen other newly formed districts, the new Districts 2 and 4 were left unnumbered (eventually labeled “2-or-4” and “4-or-2”) creating unnecessary confusion for the Commissioners representing them, as well as for the members of the public who were attempting to advocate for their neighborhoods.
- This confusion was exacerbated in Map K2 when the new District “N” was labeled “2 or 4” and District “O” was labeled “4 or 2”, and then further exacerbated in Map K2.5 when District “N” was switched to “4 or 2” and District “O” was switched to “2 or 4.”
- This situation inevitably created an inequity for residents of Districts 2 and 4, as they tried to understand what was proposed for their respective District(s), while also placing the Commissioners for those districts at a disadvantage, as they were unable to identify which District they were representing.

IV. Transparency/Access Concerns

- Despite the stated policy of “drawing maps in public,” only map adjustments were actually made in public meetings.
- The Ad Hoc Regional Committee meetings were not publicly agendaized; regional principles were agreed upon behind closed doors, despite the fact that they had a significant impact on the final map.
- There is no documentation of what was discussed at the Inter-Regional Ad-Hoc meeting held on September 25th, as Map K/K Corrected was being developed.
- Agendas for public meetings were not differentiated enough, leaving members of the public unsure of which day they needed to call in about their communities.
- The public comment process was unnecessarily challenging, especially for those without smartphones, computers or broadband. The total number of public comments received, of which many were duplicates, were from 14,000 people, representing 0.35% of the population of the City of Los Angeles.
- Commissioners often received new documents and COI testimony summaries within a few hours of the start of meetings, leaving little time for review.
- Some Communities of Interest were given access to extra time and were allowed to give presentations; the selection process for these was unclear.
- The process used to select speakers at the public meetings was unclear and inconsistent.

Recommendations

1. City Council should reevaluate Map K2.5 Final based on all public comments. This should include the decisions made on assets in CD8 and CD9 and the changes made to District 2 and District 4, as well as other changes made to the San Fernando valley.
2. In the future, a truly independent Commission should be created according to the same principles as the California State Redistricting Commission guidelines. These were passed by voter initiative and are designed to eliminate the likelihood of former politicians or other political “insiders” being selected as Commissioners.

We hope that our comments will be taken into consideration in your deliberation of the Recommendations of the Los Angeles City Council Redistricting Commission Report.

Sincerely,

Denis Cagna
Commissioner, Los Angeles City Council Redistricting Commission

Natalie Freidberg
Commissioner, Los Angeles City Council Redistricting Commission

Jackie Goldberg
Commissioner, Los Angeles City Council Redistricting Commission

Nam Le
Commissioner, Los Angeles City Council Redistricting Commission

Susan Minato
Commissioner, Los Angeles City Council Redistricting Commission

Rachel Torres
Commissioner, Los Angeles City Council Redistricting Commission

cc: The Honorable Mitch O'Farrell, President Pro Tempore, Los Angeles City Council