



## LEAGUE OF WOMEN VOTERS® OF CALIFORNIA

May 24, 2011

Via Electronic Mail  
Citizens Redistricting Commission  
1130 K Street, Suite 101  
Sacramento, CA 95814

### **Re: Mapping Criteria in the Voters FIRST Act**

Dear Members of the Citizens Redistricting Commission:

As you begin to draw the first draft maps, the League of Women Voters of California would like to offer some important considerations about the mapping criteria in the Voters FIRST Act. As you know, the criteria for drawing the maps are listed in a specific order, and you are directed by the Act to follow them in that order of priority. This is because in the complex task of drawing district lines, following one criterion may make it more difficult to fully adhere to another, lower one.

In particular, we would like to comment on the weight given to respect for the integrity of communities of interest as equal to the weight given to respect for cities, counties, cities and counties, and local neighborhoods.

The League played an integral role in the drafting of Proposition 11, the Voters FIRST Act, after working for several years on the wording of unsuccessful legislative proposals for reform. We had supported legislative bills that gave priority to communities of interest immediately after the criteria of equal population, adherence to the Voting Rights Act, and contiguity. Thus, as the discussions concerning the initiative proceeded, our position on communities of interest was clear from the beginning. Because the political and demographic geography of California is so diverse, communities of interest will often represent the real “local neighborhoods” of an area or region. Political boundaries are often arbitrary and may have been drawn long ago. While useful in mapping some areas, in many other cases they no longer reflect the actual demographic profile of an area or region.

We firmly supported having respect for the integrity of communities of interest at least in the same clause and given equal weight as respect for city and county boundaries. We signed on to the initiative measure only because respect for communities of interest was ranked just after compliance with the Voting Rights Act and geographic contiguity and equal in importance to keeping cities, counties, and neighborhoods whole.

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1107 9<sup>th</sup> Street  
Suite 300  
Sacramento, CA  
95814-3608  
916 442.7215  
888 870.8683  
916 442.7362 fax  
lwvc@lwvc.org  
www.lwvc.org  
www.smartvoter.org  
www.easyvoter.org

Drawing maps that truly empower voters throughout the state will, in certain areas, require keeping communities of interest whole, rather than maintaining artificial political boundaries which may not accurately reflect the population. We rely on your judgment to choose which approach is most appropriate for each region. **We caution against any mindset that would in all cases approach map drawing by first considering city and county boundaries and only secondarily bringing communities of interest into consideration.**

We have also observed that some members of the public encourage you to give greater weight to criteria that are low in the priority ranking, such as compactness or nesting, than to other, higher priority criteria. The Voters FIRST Act was carefully crafted with directions both as to the overall priority order and as to following such criteria “to the extent practicable, and where this does not conflict with the criteria [listed] above.” We are confident that you will follow those directions and trust that the public will be made aware of the process you have, of necessity, followed.

We thank you for your consideration of these comments and wish you well as you continue with your groundbreaking duties.

Sincerely,



Janis R. Hirohama  
President