

## Communication from Public

**Name:** Marc Silverman  
**Date Submitted:** 11/27/2023 04:45 PM  
**Council File No:** 22-1196-S1

**Comments for Public Posting:** I support the adoption of a truly independent redistricting commission in Los Angeles. City Council lines should be drawn without the influence of politicians, and district boundaries should prioritize communities of interest. We deserve a fair process that puts Angelenos first. I urge you to vote for an independent redistricting commission and end gerrymandering in our city.

## Communication from Public

**Name:** Lorraine E Kumpf

**Date Submitted:** 11/28/2023 11:06 AM

**Council File No:** 22-1196-S1

**Comments for Public Posting:** I write in support of adopting a truly independent redistricting commission in Los Angeles. I urge you to vote for an independent redistricting commission and end gerrymandering in our city. City Council lines should be drawn without the influence of politicians, and district boundaries should prioritize the communities that are involved. We deserve a fair process that puts the people of Los Angeles first! Thank you for your work!  
Lorraine Kumpf Koreatown Resident

## Communication from Public

**Name:**

**Date Submitted:** 11/28/2023 03:34 PM

**Council File No:** 22-1196-S1

**Comments for Public Posting:** Dear councilmembers, My name is Miso Jang. I live in District 14 in El Sereno and I am a member of AAPI Equity Alliance. I've been actively engaged with OUR LA's convenings this year providing my thoughts, concerns, and ideas to create an IRC that is inclusive and representative of my community and that it leads a process that deeply engages all Angelenos to help create fair district lines that reflects and unifies our diverse communities. I write to you today because I want to ensure that you vote in favor of establishing an independent redistricting commission and that you ensure that the City's IRC make explicit that English language proficiency, citizenship status, or voting record will NOT be requirements for serving on the commission, nor will they be used to discriminate against potential commissioners. Additionally, please ensure CBOs will be provided with sufficient funding and resources to carry out community outreach, training, and education campaign efforts throughout the City's redistricting process. This matters to me and my community because as an Asian American who lives in LA, I want to see more politicians who look like me and advocate on behalf of issues that impact our community. Additionally, I want to ensure that the beautiful and diverse communities that encompass LA are being represented in the policies and decision making of our home. Thank you for your consideration, Miso Jang

## Communication from Public

**Name:** Alex Fierro-Clarke

**Date Submitted:** 11/28/2023 05:12 PM

**Council File No:** 22-1196-S1

**Comments for Public Posting:** I support the adoption of a truly independent redistricting commission in Los Angeles. City Council lines should be drawn without the influence of politicians, and district boundaries should prioritize communities of interest. We deserve a fair process that puts Angelenos first. I urge you to vote for an independent redistricting commission and end gerrymandering in our city.

## Communication from Public

**Name:** Alexandra Lee Carcieri

**Date Submitted:** 11/28/2023 05:32 PM

**Council File No:** 22-1196-S1

**Comments for Public Posting:** Dear councilmembers, My name is \_\_\_\_\_. I live in (district # or region/neighborhood of LA City) and I am a member of (organization's name). I've been actively engaged with OUR LA's convenings this year providing my thoughts, concerns, and ideas to create an IRC that is inclusive and representative of my community and that it leads a process that deeply engages all Angelenos to help create fair district lines that reflects and unifies our diverse communities. I write to you today because I want to ensure that you vote in favor of establishing an independent redistricting commission and that you ensure that the City's IRC is truly independent, inclusive, and representative. This matters to me and my community because i value inclusion, engagement, and equity. Thank you for your consideration, alex carcieri

## Communication from Public

**Name:** Russia Chavis Cardenas

**Date Submitted:** 11/28/2023 06:15 PM

**Council File No:** 22-1196-S1

**Comments for Public Posting:** I am writing to you on behalf of Common Cause to share our comments in support of advancing an independent redistricting commission in Los Angeles. Angelenos deserve a process that works and honors the interest of the community. Our written comments are attached.

**Re: Support for Independent Redistricting Commission**

Dear Council President Krekorian and Councilmembers,

We urge the City Council to adopt the proposal to establish an independent redistricting commission. The proposal before you embraces integrity, fairness, transparency, and accessibility while prohibiting discriminatory redistricting practices. An independent redistricting commission that prioritizes keeping communities and neighborhoods whole and prioritizes community input in the map-drawing process, particularly from those in underrepresented communities and non-English speaking communities, is crucial to ensure that the decennial redistricting process engenders the trust of all Angelenos.

Independent redistricting commissions are proven to be more participatory and responsive to community concerns than standard processes, and result in maps that better reflect the interests of communities over incumbents.

While it is clear that an independent redistricting commission is necessary to establish a process that works for all Angelenos, an independent redistricting commission alone is insufficient. We must also pass proposals to decrease the size of Council Districts and consider additional ethics reforms to ensure that all residents of Los Angeles have full representation and for our leaders to remain accountable to our communities.

Taken together, an independent redistricting commission, smaller Council Districts, and additional ethics reforms will begin to restore Angelenos' trust in City Hall.

Thank you for your time and consideration.

## Communication from Public

**Name:** Fair Rep LA Coalition Memo  
**Date Submitted:** 11/28/2023 08:41 PM  
**Council File No:** 22-1196-S1  
**Comments for Public Posting:** Memo attached.

To: Los Angeles City Council  
From: Fair Rep LA  
Date: November 28th, 2023  
Re: Charter Reform - CF 22-1196-S1

## **Item 27 - Fair Rep LA November 28th Recommendations for Independent Redistricting and Council Size**

We appreciate the time and consideration the Governance Reform Committee has put into incorporating public feedback and advancing a proposal that would allow for the City of Los Angeles to finally have a better redistricting process. Fair Rep LA<sup>1</sup> offers the following final recommendations to ensure we deliver a truly independent redistricting commission empowered to deliver fair maps:

- 1. Alternate Commissioners:** *Amend Section C.4 to clarify whether or not alternate commissioners are able to speak at meetings.*

The IRC proposal does not explicitly state whether or not alternate commissioners can speak at meetings, or if they are simply to be present in an observational capacity. Our coalition has a mix of opinions on which option is best here, but agreement that the charter cannot be ambiguous as to this issue.

The IRC process must have a measure of stability and predictability. After the first set of eight commissioners are randomly drawn, they will go through a deliberative process in selecting the remaining twelve (four of which will be alternates). Those first eight commissioners need to know exactly how many commissioners will *actually* be able to contribute their voices to the conversation before they decide how to best represent the diversity of the city.

- 2. Ethics Oversight:** *Amend E.1&2 to clarify what the ethics commission's oversight role includes during the commission formation process.*

Sections E.1&2 indicates the ethics commission will provide "oversight" of the commission formation process, but does not specify what that is beyond developing the objective and subjective criteria for the application. This does not appear to reflect the intent of the committee, which has made clear the need for independent oversight during this crucial stage. Sections E.1&2 should be amended to ensure that all major decisions must be approved

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<sup>1</sup> Fair Rep LA participants include organizations who are both formally and informally involved in the coalition's ongoing organizing, as well as activists and members of Neighborhood Councils participating in an individual capacity. Note – these recommendations do not necessarily reflect the positions or preferences of individual organizations participating in Fair Rep LA. They are arrived at in the spirit of identifying consensus and finding compromise.

Current members of Fair Rep LA include: Abundant Housing LA, California Common Cause, CalRCV, Citizens Take Action, Ground Game LA, LA Forward, League of Women Voters of Greater Los Angeles, Los Angeles for All, Los Angeles for Democracy Vouchers, Mar Vista Voice, Represent Us, & Unrig LA

by the ethics commissioners at a public meeting, including but not limited to finalization of applications, creation of geographic regions, outreach plans, determining application deadlines, and any significant contracting.

**3. Regional Balance of Selection Pool:** *Amend E.4d to ensure a minimum number of applicants from each of the 8 regions are represented in the commission selection pool.*

The final stage of the commissioner selection process contains two steps: first, eight commissioners are drawn randomly from the final commission selection pool; and second those eight commissioners choose the remaining twelve to balance out for diversity. To ensure a level of rough geographical balance in the first step, one commissioner is randomly selected from each of the eight applicant regions. Most IRCs that use this type of selection process require that their final commission selection pool contains a minimum number of applicants from each region. Failure to do so could result in a commission selection pool that underrepresents certain regions and as a result limits the options available for the first eight commissioners as they move to the second step of the process in balancing diversity interests.

**4. Economic Assets:** *Oppose changes to expand scope of F.2 re: economic assets beyond what is currently in the proposal.*

In October, the committee considered potentially amending Section F.2 to expand the reach of the language concerning economic assets. Given the city's redistricting experience over recent cycles, the desire to ensure this issue is addressed in our charter is understandable, but ultimately redundant. The proposal requires the IRC to use the state's definition of community of interest,<sup>2</sup> which captures all of the language concerning economic assets in Section F.2. Redistricting involves consideration of many competing interests, and we believe expanding additional language concerning economic assets will cloud and confuse the conversation for both commissioners and the public.

**5. Numbering System:** *Amend F.3 to clarify district numbering system.*

The current language in F.3 must be clarified to ensure that it is not interpreted in a manner which would reinforce incumbency protections by potentially implying a preference for current district lines. We support CA Common Cause's proposed amendments.<sup>3</sup>

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<sup>2</sup> Cal Code 21130 (emphasis added): A "community of interest" is a population that shares common *social or economic interests* that should be included within a single election district for purposes of its effective and fair representation. Characteristics of communities of interest may include, but are not limited to, shared public policy concerns such as *education, public safety, public health, environment, housing, transportation, and access to social services*. Characteristics of communities of interest may also include, but are not limited to, *cultural districts, shared socioeconomic characteristics*, similar voter registration rates and participation rates, and shared histories. Communities of interest do not include relationships with political parties, incumbents, or political candidates.

<sup>3</sup> CA Common Cause 10/13 Comment:

[https://clkrep.lacity.org/onlinedocs/2022/22-1196-S1\\_PC\\_PM\\_10-13-2023.pdf](https://clkrep.lacity.org/onlinedocs/2022/22-1196-S1_PC_PM_10-13-2023.pdf)

**6. Incumbency Protection:** *Add F.4 explicitly forbidding incumbency protection.*

The proposal forbids incumbency protection, but does so via reference to state law. This language should be included in the charter directly, as discerning voters will be looking to see this solidly fixed in the charter proposal. Failure to do so could allow opponents to unfairly attack the measure as it goes to voters for approval.

**7. Interpretation Services:** *Amend G.3 to add the following language to the end, “ or two days within 28 days of the deadline to adopt boundaries.”*

The current proposal says interpretation services must be requested 3 days in advance. This becomes impractical in the final 28 days of the process, when the commission only needs to provide 3 days notice for meetings. Members of the public should have at least 24 hours after an agenda’s posting to request interpretation services.

**8. Protected Budget:** *Amend J.1 to establish a minimum protected budget, modeled after the CA IRC, that is tied to inflation.*

The State of CA’s method<sup>4</sup> for providing its IRC with a protected budget offers a degree of flexibility. If the commission receives a budget in excess of the minimum (tied to inflation), that higher budget becomes the new floor (also tied to inflation).

The current IRC proposal merely requires the IRC be provided “sufficient funds,” which could allow elected officials to undermine the independence and effectiveness of the IRC through the budget process. The IRC must be free to draw fair maps without fear that their budget might be threatened by elected officials.

**9. Use of City Resources:** *Add section prohibiting elected officials from contracting out to perform outreach & demographic services.*

In 2021, four council offices received council approval for contracts to hire demographers and consultants to assist their redistricting advocacy. This figure totaled around \$175,000. City resources should not be actively used by elected officials to undermine an IRC, and these types of contracts should be prohibited.

**10. Independent Legal Representation:** *Amend K.8 to require the commission to retain outside counsel.*

The IRC must be able to access and rely upon independent legal advice. The LA City Attorney is an elected official, and the office is primarily responsive to serving the legal

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<sup>4</sup> CA Government Code Chapter 3.2 - Section 8253.6  
[https://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=8253.6.&nodeTreePath=3.1.10&awCode=GOV](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8253.6.&nodeTreePath=3.1.10&awCode=GOV)

interests of the council and mayor, which may give rise to a conflict of interest. While the current proposal allows the IRC to choose outside counsel if it elects to, it provides no assurance the IRC will have the financial resources necessary to retain outside counsel.

**11. Commissioner Compensation:** *Amend K.9 to establish a minimum per diem for commissioners (and allow increase via administrative code).*

In order to ensure that Angelenos of all backgrounds are able to serve on the IRC, it is imperative that commissioners receive meaningful compensation for their time and service. The proposed charter reforms leave the question of commissioner compensation to the administrative code. Most city commissioners receive a stipend between \$25-\$50, if they receive one at all. For context, the State of California's IRC offers its commissioners \$300 per meeting. There might be good reason to refrain from baking a specific number into the charter, but we believe it would be best to set a floor for compensation in the charter, and allow for further increases via administrative code.

**12. City Data Bureau:** *Oppose placing the City Data Bureau within the Library Department.*

Section M of the IRC proposal calls for the creation of a City Data Bureau. It does not delineate its structure, but committee discussion has suggested potentially housing it within the Library Department. While that department does offer the benefit of a protected budget, its commission is composed exclusively of mayoral appointees and does not represent a sufficiently independent body needed to oversee the important responsibilities of a City Data Bureau.

**13. Limited Campaign Transfers:** *Add language providing that within in the 30 days following the IRC's submission of final maps, City Council candidates (with existing accounts for that year's campaign cycle) drawn out of the district they were running to represent to have a one time opportunity to transfer/redesignate campaign funds to an account for the council district in which they reside (if that district is scheduled to be on the ballot at the same time).*

Redistricting can involve dramatic changes to representation at the least opportune time, just before candidates are set to qualify for the ballot. This will inevitably be the case if council size is increased. The City of LA's strict fundraising windows and campaign finance regulations pose a unique challenge for candidates drawn out of the district race for which they were fundraising. Council candidates drawn out of their districts cannot simply transfer their funds to a new account. They would be faced with two options. They could move, or they could return all of the contributions previously received and ask supporters to donate to their new account (at the same time the campaign is attempting to juggle our onerous ballot qualification process).

While this dynamic is complicated for any candidate to wade through, it impacts grassroots candidates much more severely. Finding a new place of residence at the drop of a

hat in LA borders on the impossible. Well resourced establishment candidates might own other properties across the city, and would have no shortage of acquaintances in the real estate industry eager to help them find a new residence. Returning contributions and asking donors to give to a new account would be an administrative nightmare for anyone going down that route, but a well resourced campaign would have a much easier time handling that process.