



**MICHAEL N. FEUER**  
CITY ATTORNEY

October 14, 2022

The Honorable City Council  
of the City of Los Angeles  
Room 395, City Hall  
200 North Spring Street  
Los Angeles, California 90012

Re: Proposal for Independent Redistricting and Additional Reform  
(CF 21-1472, CF 22-1196, and CF 22-1197)

Honorable Members:

The recent release of the hateful conversation in which three City Councilmembers discussed how City Council districts should be drawn makes inescapably clear that the City needs a truly independent redistricting process to ensure the fairness and legitimacy of district boundaries and the system that establishes them. We need to act urgently to begin to heal the divisions in our city, reform how our city conducts business and restore public confidence and trust.

The purpose of this letter is to strongly recommend that the Council immediately prepare a Spring, 2023, Charter Reform ballot measure to create independently-drawn Council District boundaries in time for the 2024 City election cycle, and call a Special Election for Spring, 2023. In addition, I propose a Spring, 2024, Charter Reform ballot measure to create a new, independent City redistricting system for future city elections, along with other reforms, including cutting City Council districts in half to facilitate more responsive and diverse representation.

**Spring, 2023, Charter Reform ballot measure.** I urge you to call a Special Election in Spring, 2023, for a Charter amendment that would require new Council District lines to be redrawn independently before the 2024 elections. A mechanism already exists in State law for a general law city to contract with a county to have the county's independent redistricting commission draw a city's council district lines. (California Elections Code Section 23004.) By Charter amendment, Los Angeles can, and should,

do the same. The Charter amendment should authorize and require the City to contract with the County to utilize the existing independent Los Angeles County Citizens Redistricting Commission to redraw Council District lines for the 2024 election cycle.

The structure and process of the Los Angeles County Citizens Redistricting Commission is already codified in the State Elections Code. (See California Elections Code Sections 21530-21535.) The Commission is comprised of 14 members appointed from a pool of qualified applicants without the influence of elected officials. State law requires that members represent the diversity of the area and possess experience relevant to redistricting and voting rights. Recent elected officials and candidates, political consultants, and lobbyists are not eligible to be on the Commission.

The County Redistricting Commission must adhere to redistricting criteria similar to those contained in the City Charter. Districts must comply with the U.S. Constitution and federal Voting Rights Act, and respect communities of interest. The Commission's process must comply with the Brown Act and include public hearings soliciting input regarding redistricting. The Commission's map is final and not subject to approval of the legislative body.

State law provides that the term of office of the County Commission members continues for the duration of the decade until the next commission is appointed. This means that no new appointment process would be needed, because the County Commission is in place and can begin working on a new map for Los Angeles City Council districts immediately upon adoption of a Charter amendment.<sup>1</sup> All necessary data from the Decennial Census is, of course, already available. The Commission should be equipped to draft new lines before candidate filing deadlines for the 2024 election cycle.

Because the City Charter currently does not allow the City to engage an independent redistricting commission such as the County Commission to draw Council District lines, a simple Charter amendment is required to make that happen.

**Spring, 2024, Charter Reform ballot measure.** As I have advocated, the City also needs to develop and establish its own truly independent redistricting commission enshrined in the City Charter for future elections. And I believe that City Council districts, each currently as large as the cities of Buffalo or Boise, should be cut in half to make Councilmembers more responsive and accountable. Doing so would also make the Council more diverse. I am aware of the motions seeking such reform measures be placed on the 2024 ballot, and strongly support that effort.

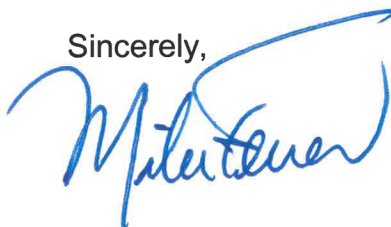
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<sup>1</sup> It appears the County Commission currently has one vacancy, which the Commission members are empowered to fill.

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My Office stands ready to assist these reform efforts in any way we can. Ensuring new districts are independently drawn before the next election cycle would be an essential start.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Feuer", with a large, sweeping flourish above it.

MICHAEL N. FEUER, City Attorney

MF: aj