

April 25, 2021

California Citizens Redistricting Commission  
721 Capitol Mall, Suite 260  
Sacramento, CA 95814

*Sent via electronic transmission*

Dear Commissioners,

Thank you for your deep commitment to ensuring a transparent and fair redistricting process that centers public engagement and community voices. Your tenacity in addressing and finding solutions to a multitude of challenges, from the 2020 Census delays and uncertainty of timelines to the limitations imposed by COVID-19, is greatly appreciated.

On behalf of the Integrated Voter Engagement (IVE) Redistricting Alliance, the undersigned organizations respectfully write to provide you with our recommendation for an optimal timeline that (1) ensures adequate time to engage, prepare, and mobilize residents for submitting maps and providing input on the Commission's draft maps, (2) mitigates the challenges of activating residents to participate in the redistricting process amidst a possible recall election in November and the holiday season, and (3) balances the need for a robust redistricting process with the elections calendar.

The IVE Redistricting Alliance was formed to empower low-income, Black, Indigenous, and people of color residents to participate in the 2021 California redistricting process. Partners include statewide and regional networks of community-based organizations (CBOs) that implement IVE strategies and prioritize issues of racial and economic equity. IVE Alliance partners will be working with community members to identify and lift up communities of interest to the commission. In addition, partners will be involved in both statewide unity mapping and regional district mapping. To ensure all communities, especially those that are most underrepresented in our democracy, have the necessary time to fully engage throughout the redistricting process, **we recommend that the final map adoption be set for January 28, 2022, and we support moving the primary election to no later than June 21, 2022** to accommodate any necessary shifts to the 2022 elections calendar as a result.

As you consider a multitude of recommendations and search for the best balance in all of them, please continue to center time for community input in all stages of the redistricting process. The California Citizens Redistricting Commission (Commission) came to be because communities advocated, placed on the ballot, and voted for a measure to create a redistricting process that is transparent, participatory, and ultimately shaped by residents. Communities are at the heart of why we have an independent redistricting commission process, and it will be those communities that ultimately bear the impact of the final maps for the next ten years. So, it matters profoundly what deadline is set.

Additionally, we recognize that the redistricting deadline will have significant impacts on the 2022 primary election and, subsequently, the general election. As networks of CBOs that apply IVE programs, we are committed to ensuring communities most impacted by systemic racial and economic inequities – and most marginalized by our democracy – cast their votes. Therefore, our recommendation reflects our interest in keeping the primary election within June so as not to severely disrupt election processes, while creating the flexibility necessary for the Commission, Secretary of State, and election officers at every jurisdictional level to fulfill their mandates to California residents and voters.

**We believe that setting the redistricting deadline to January 28, 2022, with a primary election date of no later than June 21, 2022, will:**

- **Allow communities adequate time to engage in every part of the redistricting process:** Communities deserve and have a right to fully participate in our democracy, whether it is through voting, engaging elected officials, advocating for policy solutions, and/or shaping their district maps. To undermine residents' ability to fully engage in any process of our democracy hurts us all, and most severely, low-income, Black, Indigenous, and people of color communities. Ensuring enough time for community input in the redistricting process is imperative so that no community is disempowered for the next ten years. Communities need time to: (1) understand and analyze redistricting data when it becomes available; (2) draw initial maps; (3) communicate with each other and work through potential points of conflict; (4) prepare testimony and advocacy on behalf of their maps; (5) understand and analyze the Commission's draft maps; (6) provide feedback on the Commission's draft maps; and (7) comment on the Commission's final deliberations in the waning days of the redistricting process. Having these activities occur during times when the public may not fully engage will only hurt the Commission's opportunity to receive substantive and meaningful input. Similarly, ensuring as much time as reasonably possible to prepare for elections is critical so that no voter is disenfranchised. This includes having adequate time to prepare precinct maps at every jurisdictional level; gather signatures in-lieu; undergo the nomination process; prepare and deliver voter election materials, among many more crucial steps so that both candidates and the electorate are fully prepared to participate in elections.
- **Recoup two weeks of critical time lost to the holidays:** Given a potential recall election this November and a redistricting process that overlaps with the holidays, community residents that often face barriers to public participation may face even more barriers in attempts to engage in the redistricting process. These barriers include the following: (1) Commission meetings that conflict with holiday travel and quality time with immediate and extended family members; (2) constrained access to community organizations, businesses, and public institutions that could help residents understand the maps and process; and (3) the complexity of navigating multiple redistricting processes happening at the same time at the state and local levels. Without full community engagement and input, we risk creating unfair district lines. However, if the Commission were to provide time for public participation after the holidays, residents would have some relief from the

abovementioned barriers and, therefore, greater opportunity to participate in the final stages of the redistricting process. Furthermore, with additional time after the holidays, CBOs would be able to better support communities in analyzing and providing feedback on the draft and final maps.

Our proposal represents an optimal timeline that relieves pressure for residents and the Commission, while also providing time for a condensed election calendar and respecting the needs of other stakeholders including the Secretary of State and elections officials. We hope our recommendation provides the best path forward for everyone. Please reach out to Alejandra Ponce de León with Advancement Project California at [aponcedeleon@advanceproj.org](mailto:aponcedeleon@advanceproj.org) should you need more information. Thank you for your service and consideration.

Sincerely,

AAPIs for Civic Empowerment Education Fund

Advancement Project California

Alliance San Diego

Asian Americans Advancing Justice – Asian Law Caucus

California Black Census and Redistricting Hub

California Calls

California League of Conservation Voters Education Fund

California Native Vote Project

Central Coast Alliance United for a Sustainable Economy (CAUSE)

Council on American-Islamic Relations – California (CAIR-CA)

Dolores Huerta Foundation

Equality California

IE United

Mi Familia Vota Education Fund

Orange County Civic Engagement Table (OCCET)

PICO CA

Power California