



July 20, 2021

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

Sent via electronic transmission to votersfirstact@crc.ca.gov

Re: Community-Based Organization and Community Coalition Representation

Dear Chair Kennedy and Commissioners:

Thank you for your dedication to ensuring a fair and inclusive redistricting process for all Californians. Your perseverance and commitment to education, outreach, and engagement in the midst of a pandemic has been, and continues to be, extraordinary.

The League of Women Voters of California (LWVC) writes to address an issue that has arisen in recent meetings related to evaluating and weighing the testimony of individuals who represent a larger group of people. **We are concerned about coordinated attempts to influence you to discount testimony presented by community-based organizations (CBOs) and coalitions speaking for underrepresented Californians and urging you to ignore unity maps. In order to achieve your goal to guarantee that everyone has a voice in redistricting, it is imperative to allow and give weight to input from CBOs and coalitions who speak for those who have historically been left behind in our democracy.**¹

The LWVC has extensive experience with what it takes to achieve meaningful public participation, both through decades of outreach work in communities throughout California and in the context of the 2010 Commission's work. Public testimony can be perceived as a series of nesting blocks. Individuals offer individual opinions. Individuals can group together into community-based organizations (CBOs) that offer the opinion(s) of the group. Coalitions of CBOs offer a larger, more comprehensive perspective. **In order**

¹ We note that you receive testimony from a broad array of groups representing homeowners, neighborhoods, businesses, non-profits, religious faiths, geographic regions, and political, cultural and linguistic sectors. Organized for a variety of different purposes, these groups represent their members, help educate them, and are trusted to speak for them. If the Commission accepts the unified testimony of some groups, then basic equity demands the same level of acceptance apply to all groups. In concrete mapping terms, when you start drawing lines in Los Angeles Koreatown, you should weigh both input from the Hancock Park Homeowners Association and Asian Americans Advancing Justice.

to represent the whole state, the Commission must hear public input from a broad array of sources, balance the various interests expressed, and use its judgment to determine what complies with the law and is fair to all Californians.

As the Commission weighs input from groups and individuals, it is important to recognize that barriers are higher for underresourced communities and people without access to corridors of power. CBOs and community coalitions do a huge amount of work to remove impediments, build trust, educate and empower members, facilitate engagement, and represent the interests of the community. **Both redistricting testimony, and community of interest maps submitted by CBOs and community coalitions, are key to ensuring that underrepresented Californians have a voice.**

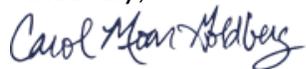
The LWVC also believes that it is critical that the Commission permit and take serious account of the “unity maps” produced by CBOs and community coalitions. These maps are an important asset as the Commission strives to identify solutions to knotty problems of representation among different local groups living in overlapping boundaries. They are often the result of careful negotiations by impacted groups. Furthermore, they are a constructive strategy to preempt divisive tactics that have been historically used to “divide and conquer” groups with natural affinities. Finally, if unity maps are accepted from business and trade groups, then equity demands that they likewise be accepted from CBOs and community coalitions.

Part of the Commission’s responsibility is to assess the motivation behind testimony and whether its purpose is to enhance or impede representation. While it may be tempting to rely on quantitative measures like numbers of comments or maps submitted, it is important to weigh the sources and motives of those providing input. It is also critical that, as it weighs testimony, the Commission remains flexible and agile enough to make judgment calls in the best interest of democracy.

The work of the Commission is both art and science. As you proceed you will be called upon to make judgment calls about the motivations of participants and the sources of input. It is crucial that you listen carefully for the voices of communities and remember that it is harder for those who are historically underrepresented to make themselves heard.

Thank you for your service to Californians.

Sincerely,



Carol Moon Goldberg
President