



# SAN FRANCISCO 2022 REDISTRICTING

## **Final Report Member Statement**

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## Table of Contents

<b>Table of Contents</b>	<b>2</b>
<b>Introduction</b>	<b>3</b>
Process	3
Public Meetings	3
Working Draft and Draft Final Maps	4
Outreach and Language Access	4
Statutory Criteria	4
Communities of Interest	5
Federal Voting Rights Act	5
Population Variations	5
<b>Adjustment of Lines</b>	<b>6</b>
District One	6
District Two	8
District Three	9
District Five	12
District Six	14
District Seven	16
District Eight	16
District Nine	17
District Ten	18
District Eleven	19
<b>Conclusion</b>	<b>20</b>
<b>Acknowledgements</b>	<b>21</b>
<b>Errata</b>	<b>21</b>
<b>Attachments</b>	<b>22</b>

## Introduction

The final redistricting map, adopted by the 2022 Redistricting Task Force (“RDTF”) by a five to four split vote on April 28, 2022<sup>1</sup>, is the result of a flawed and mismanaged redistricting process. The author of this statement cannot in good faith state the final approved map conforms to all the legal requirements.

Some of the failures experienced were due to the COVID-19 pandemic or the lack of adequate funding, but these excuses fail to explain the more fundamental failures in the decision-making process of the RDTF. The final map needlessly splits (“cracks”) many marginalized communities of interest made up of vulnerable populations that should have remained in the same district for the purpose of their fair and effective representation. The final map does not fairly reflect the public input received at public meetings nor does it fairly reflect communities of interest in San Francisco, both fundamental statutory requirements to the redistricting process.

When other criteria-compliant alternatives to this final map were known to exist and were explored by the RDTF, important adjustments to district lines in the final approved map can only be described as intentional gerrymandering.

## Process

### **Public Meetings**

The San Francisco Charter<sup>2</sup> requires the Redistricting Task Force to make adjustments to the district lines “*as appropriate based on public input at public hearings*”. The RDTF held forty-six public meetings, for a total of 234 hours. The previous 2012 Redistricting Task Force held thirty public meetings, for a total of 100 hours. The RDTF did not hold a single in-district, in-person public meeting outside of the meetings held at City Hall.

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<sup>1</sup> Thirteen days after the San Francisco charter deadline of April 15.

<sup>2</sup> [https://codelibrary.amlegal.com/codes/san\\_francisco/latest/sf\\_charter/0-0-0-1234](https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-1234)

### **Working Draft and Draft Final Maps**

Despite the robust meeting schedule, the 2022 RDTF only released its first working/draft map on March 9, nine weeks after the 2012 Redistricting Task Force first released its first working/draft map. Both draft final maps were all released a few days before the last scheduled meeting of the RDTF, effectively eliminating the possibility of actionable public input. Working/draft and draft final maps were only released online. RDTF leadership consistently opposed working on or releasing a draft/working map earlier.

### **Outreach and Language Access**

For weeks towards the end of the process, the RDTF did not have an outreach consultant, which only highlighted the fact that the majority of its community outreach had been exclusively online, principally through mass emails, which further limited public outreach. At multiple public meetings, RDTF members and members of the public correctly criticized the failure to provide adequate language access, hindering the ability of non-English speakers to meaningfully participate in the redistricting process.

### **Statutory Criteria**

The RDTF never discussed how to fairly apply the various statutory criteria or how to effectively organize the thousands of public comments received. Only during the last week was the ranking of the various statutory criteria discussed by a subset of the RDTF (a direct result of an Election Commission hearing), but no consensus was reached and discussion was never elevated to the full RDTF at a public meeting (see attached draft *Proposed Ranked Statutory Criteria*). The RDTF also did not come up with a clear process on how to consider conflicting input from competing communities of interest, leading to arbitrary decisions regarding adjustments of district lines.

### **Communities of Interest**

The San Francisco Charter<sup>3</sup> requires the Redistricting Task Force redistricting to reflect communities of interest within the City and County of San Francisco. The RDTF never adopted a formal definition of communities of interest. In addition, no significant discussion was ever had on how to deal with communities of interest that were deemed “unmappable”, which effectively prioritized a subset of received public input that was able to be loaded into the mapping consultant’s systems.

### **Federal Voting Rights Act**

The final map was supposed to comply with the Federal Voting Rights Act, as detailed by the Office of the City Attorney’s March 14 Voting Rights Act Section 2 Analysis memo. Nonetheless, from the March 25 meeting onward, the majority of the RDTF went against said advice, splitting the communities of interest located in the Tenderloin and South of Market on the basis of race. No serious arguments were made by members of the RDTF to ensure subsequent maps were legally defensible and compliant with the VRA. The aforementioned communities of interest remained divided in the final map.

### **Population Variations**

Population variations between districts must be limited to 1 percent from the statistical mean unless recognized neighborhoods are kept intact or to prevent the division or dilution of the voting power of minorities. The final map goes above the 1 percent limit in all but one of the eleven districts (District 3) while splitting many recognized neighborhoods such as University Mound, Francisco Heights and Stonestown.

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<sup>3</sup> [https://codelibrary.amlegal.com/codes/san\\_francisco/latest/sf\\_charter/0-0-0-1234](https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-1234)

## Adjustment of Lines

### **District One**

The District 1 lines were adjusted to:

1. **Include** the entirety of the 2006 Mayor's Office of Neighborhood Services (MONS) SF Find recognized neighborhoods of Sea Cliff and Presidio Terrace as well as the northside of Lake Street corridor connecting these two recognized neighborhoods. (Area One)
2. **Exclude** the area north of Anza Street in the 2006 MONS SF Find recognized neighborhood of Lone Mountain. (Area Two)
3. **Exclude** the area south of John F. Kennedy Drive in Golden Gate Park. (Area Three)

Discussion on adjustments to District One:

1. The RDTF received conflicting public input in regards to including aforementioned Area One in District 1:
  - a. Residents living in the areas north of Lake Street stated they shopped, dined and volunteered in the Richmond District and felt their community of interest was split by the previous district lines.
  - b. Most residents living in the Richmond District who gave public input felt that their voting power would be diluted if the areas north of Lake Street were added to District 1. Many felt more affinity with the neighborhood of Anza Vista. These residents identified as vulnerable populations of working-class renters, many of immigrant origin or members of communities of color and did not feel like the residents living in the areas north of Lake Streets were part of their various communities of interest, as they were perceived to be wealthier and more often homeowners.
  - c. The existence of the latter communities of interest made up of vulnerable populations is corroborated by the SF Planning Department's Priority Equity

Geographies map<sup>4</sup> and by the SF Department of Public Health's 2016 Areas of Vulnerability<sup>5</sup> which both "*track areas with a higher density of vulnerable populations...including but not limited to people of color, seniors, youth, people with disabilities, linguistically isolated households, and people living in poverty or unemployed*". Area One is not included in these maps, which indicate that two distinct communities of interest exist.

- d. The vulnerability of the latter group is also confirmed by the analysis performed by the Urban Displacement Project<sup>6</sup> (a joint project of the University of California - Berkeley and the University of Toronto), in collaboration with the San Francisco Mayor's Office of Housing and Community Development. The analysis identifies significant parts of the Richmond District, south of Lake Street, as undergoing "Advanced Gentrification" while listing areas north of Lake Street as "Stable/Advanced Exclusive". This analysis further confirms that there are two different communities of interest.
  - e. Since there were alternative areas like Anza Vista that could be included in District 1 that would fulfill the other redistricting criteria and which residents of the Richmond indicated affinity to during their public input, the author of this statement does not believe that it was necessary to adjust district line to include Area One in District 1 since it would reasonably dilute the voting power of various identified communities of interest made up of vulnerable populations by prioritizing the wishes of a wealthier, stabler community of interest.
2. By excluding the aforementioned Area Two, the RDTF split at least two recognized neighborhoods:
- a. Francisco Heights Civic Association, which the association opposed in writing and which multiple members of the public also opposed.
  - b. The 2006 MONS SF Find recognized neighborhood of Lone Mountain.
  - c. There was no or minimal public input received at public meetings justifying this adjustment or splitting these recognized neighborhoods.

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<sup>4</sup> <https://sfhousingelement.org/priority-equity-geographies>, also attached.

<sup>5</sup> <https://data.sfgov.org/Geographic-Locations-and-Boundaries/Areas-of-Vulnerability-2016/kc4r-y88d>

<sup>6</sup> <https://www.urbandisplacement.org/maps/sf-bay-area-gentrification-and-displacement/>

- d. By choosing to split these recognized neighborhoods, the author of this statement believes the RDTF is limited to a 1 percent from the statistical mean population variation for District 1.
3. By excluding the aforementioned Area Three, the RDTF split Golden Gate Park, which is also a 2006 MONS SF Find recognized neighborhood. By choosing to split this recognized neighborhood, the author of this statement believes the RDTF is limited to a 1 percent from the statistical mean population variation for District 1.

## **District Two**

The District 2 lines were adjusted to:

1. **Exclude** the entirety of the 2006 Mayor's Office of Neighborhood Services (MONS) SF Find recognized neighborhoods of Seacliff and Presidio Terrace as well as the northside of Lake Street connecting them. (Area One)
2. **Include** the area north of Anza Street in the 2006 MONS SF Find recognized neighborhood of Lone Mountain. (Area Two)
3. **Include** the area south of Turk Blvd and west of Broderick St in the 2006 MONS SF Find recognized neighborhood of the Western Addition with the exception of the block bounded by Baker, Golden Gate, Broderick, and McAllister. (Area Three)
4. **Include** most of the 2006 MONS SF Find recognized neighborhood of Cathedral Hill with the exception of Jefferson Square Park. (Area Four)
5. **Excludes** most of the 2006 MONS SF Find recognized neighborhood of Russian Hill with the exception of the area north of Chestnut St and west of Hyde St. (Area Five)

Discussion on adjustments to District Two:

1. Area One and Area Two are discussed under District One adjustments.
2. Area Three and Area Four are discussed under District Five adjustments.
3. Area Five is discussed under District Three Adjustments.



### **District Three**

The District 3 lines were adjusted to:

1. **Include** most of the 2006 MONS SF Find recognized neighborhood of Russian Hill with the exception of the area north of Chestnut St and west of Hyde St. (Area One)
2. **Include** areas north of Geary Street between Van Ness and west of Leavenworth and a single block south of Eddy St and north of Market St (Area Two)

Discussion on adjustments to District Three:

1. The RDTF received conflicting public input in regards to including aforementioned Area One:
  - a. Russian Hill was split in the previous district map. The D3 United Map proponents made the argument that a complete Russian Hill, along all the other neighborhoods in D3, were one community of interest connected principally through tourism.
  - b. The D3 United Map was a clear attempt to reverse engineer District 3 with a complete Russian Hill while avoiding the inclusion of the Tenderloin in District 3. This was confirmed by hundreds of letters received which principally focus on the possibility of the inclusion of the Tenderloin into District 3, which was never seriously entertained by the RDTF.
  - c. There were a significant number of members of the public and organizations that expressed concern at public meetings and in writing around the dilution of the voting power of working-class Chinese residents in Chinatown by the inclusion of a complete Russian Hill into District 3.
  - d. The existence of the communities of interest made up of vulnerable populations in Chinatown and North Beach is corroborated by the SF Planning Department's Priority Equity Geographies map<sup>7</sup> and by the SF Department of Public Health's 2016 Areas of Vulnerability<sup>8</sup>, both which "*track areas with a higher density of vulnerable populations...including but not limited to people of*

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<sup>7</sup> <https://sfhousingelement.org/priority-equity-geographies>

<sup>8</sup> <https://data.sfgov.org/Geographic-Locations-and-Boundaries/Areas-of-Vulnerability-2016/kc4r-y88d>

*color, seniors, youth, people with disabilities, linguistically isolated households, and people living in poverty or unemployed”*. Russian Hill is not included in these maps.

- e. The vulnerability of various communities of interest in Chinatown and North Beach are also confirmed by the analysis performed by the Urban Displacement Project, a collaboration by the University of California - Berkeley and the University of Toronto, in collaboration with the San Francisco Mayor’s Office of Housing and Community Development. Russian Hill is listed as a stable area or an area that is becoming exclusive.
  - f. The RDTF could have made Russian Hill whole in District 2 and added the East Cut Community Benefit District in the South of Market, which has up to 30% low-income units, which supporters of the Community Unity Map Coalition showed affinity with. This would have fulfilled all redistricting criteria without diluting the voting power of various communities of interest made up of vulnerable populations and kept various recognized neighborhoods whole.
2. The inclusion of Area Two in District 3 reflected public input received at public meetings, including input received from the Community Unity Map Coalition.

**District Four** The District 4 lines were adjusted to:

1. **Include** parts of the 2006 MONS SF Find recognized neighborhoods of Merced Manor and Lakeshore south of Sloat Blvd. (Area One)
2. **Include** areas north of Lincoln Way and south of John F. Kennedy Drive in Golden Gate Park (Area Two)
3. **Exclude** all areas east of 19th Ave in the Inner Sunset. (Area Three)

Discussion on adjustments to District Four:

1. The RDTF received conflicting public input in regards to including aforementioned Area One in District 4:
  - a. Some residents of Merced Manor and Lakeshore strongly felt that they were a community of interest with the neighborhoods that make up the West of Twin Peaks Central Council.

- b. This affinity is corroborated by 1937 San Francisco Residential Security Map<sup>9</sup>.
  - c. Some residents of Merced Manor and Lakeshore felt that they were a community of interest with the Sunset, particularly its commercial corridors.
  - d. Some residents of the Sunset felt that Lowell High School should be included in District 4.
  - e. Most residents living in the Sunset District felt that their voting power would be diluted if the areas south of Sloat were added to District 4. These residents identified as vulnerable populations of working-class renters, many of immigrant origin or members of communities of color and did not feel like the residents living in the areas south of Sloat Blvd were members of their various communities of interest.
  - f. The vulnerability of these communities of interest is confirmed by the analysis performed by the Urban Displacement Project<sup>10</sup>, a collaboration by the University of California - Berkeley and the University of Toronto, in collaboration with the San Francisco Mayor's Office of Housing and Community Development. It identifies significant parts of the Sunset District as undergoing "Advanced Gentrification" while listing areas south of Sloat Blvd as "Stable Moderate/Mixed Income".
  - g. Since the inclusion of other areas to District 4 (such as parts of the Inner Sunset, supported by members of the public, including supporters of the Community Unity Map) would fulfill other redistricting criteria, the author of this statement does not believe that it was necessary to adjust the district lines to include areas south of Sloat Blvd since it would reasonably dilute the voting power of various communities of interest made up of vulnerable populations in the Sunset.
  - h. This adjustment also split the 2006 MONS SF Find recognized neighborhoods of Lakeshore and Merced Manor, which was opposed publicly and in writing.
2. The RDTF split Golden Gate Park, which is also a 2006 MONS SF Find recognized neighborhood, by adding the aforementioned Area Two.
  3. Area Three is discussed under District Seven Adjustments.

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<sup>9</sup> <https://maps.princeton.edu/catalog/stanford-pc204zy5923>

<sup>10</sup> <https://www.urbandisplacement.org/maps/sf-bay-area-gentrification-and-displacement/>

## **District Five**

The District 5 lines were adjusted to:

1. **Exclude** the areas roughly south of Frederick St and Lincoln Way, including all areas in the 2006 MONS SF Find recognized neighborhoods of the Inner Sunset, Parnassus Heights, Cole Valley and Ashbury Heights and parts of the 2006 MONS SF Find recognized neighborhood of Buena Vista south of Waller St and east of Masonic Ave. (Area One)
2. **Exclude** the areas of Golden Gate Park south of Pelosi Dr/MLK Jr Dr and west of Kezar Dr. (Area Two)
3. **Exclude** areas around north of Market Street and roughly between Octavia Ave and Van Ness Avenue, variously part of the 2006 MONS SF Find recognized neighborhoods of Mint Hill, Lower Haight and Civic Center. (Area Three).
4. **Include** areas roughly east of Van Ness Avenue, north of Grove and Market Streets, south of Geary Ave and west of Mason St, variously part of the 2006 MONS SF Find recognized neighborhoods of the Tenderloin and Civic Center. (Area Four)
5. **Exclude** the area south of Turk Blvd and west of Broderick St in the 2006 MONS SF Find recognized neighborhood of the Western Addition with the exception of the block bounded by Baker, Golden Gate, Broderick, and McAllister. (Area Five)
6. **Exclude** most of the 2006 MONS SF Find recognized neighborhood of Cathedral Hill with the exception of Jefferson Square Park. (Area Six)

Discussion on adjustments to District Five:

1. The RDTF received conflicting public input in regards to including aforementioned Area One in District 5:
  - a. The 2006 MONS SF Find recognized neighborhood of the Inner Sunset was split in the previous district map.
  - b. Some residents living in the southern part of the Inner Sunset and south of the neighborhood proper felt they formed a community of interest.
  - c. Most residents of the Inner Sunset stated they had affinity with the Sunset or with the neighborhoods surrounding the Haight. These residents identified as

vulnerable populations of working-class renters, many of immigrant origin or members of communities of color.

- d. The vulnerability of these communities of interest is confirmed by the analysis performed by the Urban Displacement Project<sup>11</sup>, a collaboration by the University of California - Berkeley and the University of Toronto, in collaboration with the San Francisco Mayor's Office of Housing and Community Development. It identifies significant parts of the Inner Sunset as undergoing "Advanced Gentrification" while listing areas south of Parnassus Ave and 17th St as "Stable/Advanced Exclusive".
  - e. This adjustment did not fairly reflect public input. Other proposed adjustments would have fulfilled all redistricting criteria without diluting the voting power of various communities of interest made up of vulnerable populations and kept various recognized neighborhoods whole.
2. The RDTF continued to split Golden Gate Park, which is also a 2006 MONS SF Find recognized neighborhood, by excluding the aforementioned Area Two.
  3. The RDTF split various recognized neighborhoods, including the 2006 MONS SF Find recognized neighborhoods of Mint Hill, Lower Haight and Civic Center, by excluding the aforementioned Area Three. The adjustments did not reflect any public input received at public meetings or via email.
  4. Area Four is discussed under District Six Adjustments.
  5. The adjustments made in Area Five and Area Six roughly reflect input received from a small number of members of the public through email directing to an anonymous website<sup>12</sup> with a proposed map of District 5.
    - a. The existence of the communities of interest made up of vulnerable populations in these areas is corroborated by the SF Planning Department's Priority Equity Geographies map<sup>13</sup> and by the SF Department of Public Health's 2016 Areas of Vulnerability<sup>14</sup>, both which "*track areas with a higher density of vulnerable populations...including but not limited to people of color, seniors, youth, people with disabilities, linguistically isolated households, and people living in poverty or unemployed*". Neighborhoods north of these areas are not included.

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<sup>11</sup> <https://www.urbandisplacement.org/maps/sf-bay-area-gentrification-and-displacement/>

<sup>12</sup> <https://sf-redistrict-proposal.webflow.io/>

<sup>13</sup> <https://sfhousingelement.org/priority-equity-geographies>

<sup>14</sup> <https://data.sfgov.org/Geographic-Locations-and-Boundaries/Areas-of-Vulnerability-2016/kc4r-y88d>

- b. The vulnerability of the populations living in these areas is confirmed by the analysis performed by the Urban Displacement Project<sup>15</sup>, a collaboration by the University of California - Berkeley and the University of Toronto, in collaboration with the San Francisco Mayor's Office of Housing and Community Development. It identifies significant parts of these areas as experiencing "Advanced Gentrification" while listing areas north of them as stable or exclusive.
- c. These adjustments diluted the voting power of various communities of interest made up of vulnerable populations in these areas.

### **District Six**

The District 6 lines were adjusted to:

1. **Include** areas around north of Market Street and roughly between Octavia Ave and Van Ness Avenue, variously part of the 2006 MONS SF Find recognized neighborhoods of Mint Hill, Lower Haight and Civic Center. (Area One)
2. **Exclude** areas roughly east of Van Ness Avenue, north of Grove and Market Streets, south of Geary Ave and west of Mason St, variously part of the 2006 MONS SF Find recognized neighborhoods of the Tenderloin and Civic Center. (Area Two)
3. **Include** the area remaining parts of the 2006 MONS SF Find recognized neighborhood of Showplace Square. (Area Three)

Discussion on adjustments to District Six:

1. Area One is discussed under District Five adjustments.
2. The Area Two adjustment was the most contentious and significant adjustment made by the RDTF.
  - a. As heard during public comment at public meetings and through email to the RDTF by hundreds of members of the public, this adjustment split many communities of interest made up of vulnerable populations that should have

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<sup>15</sup> <https://www.urbandisplacement.org/maps/sf-bay-area-gentrification-and-displacement/>

remained in the same district for the purpose of their fair and effective representation, including but not limited to:

- i. Working-class Filipino renters. Roughly 30% of this community of interest lives in the Tenderloin, with the remainder in the South of Market.
  - ii. Working-class Latino renters, many of them essential workers and including a significant number of people of Indigenous descent. Roughly half of this community of interest lives in the Tenderloin and half in the South of Market.
  - iii. The LGBTQ community, with the transgender community being disproportionately impacted.
  - iv. Working-class renters of all backgrounds, including Asian and Arab, including hundreds of families.
  - v. Service workers, including members of SEIU Local 87 and UNITE Here Local 2, which work in office buildings and hotels in the South of Market respectively and live and organize in the Tenderloin.
  - vi. Members of IFPTE Local 21 which work in and around the Civic Center and organize in the South of Market.
- b. The adjustment also split the Transgender Cultural District, but managed to keep various Community Benefit Districts nearly whole.
  - c. At least one compliant alternative was explored which kept these communities of interest whole. This alternative moved the East Cut Community Benefit District, which has up to 30% low-income units, out of District 6 and into District 3. Various residents of the East Cut (including the author of this statement) spoke up in favor of this adjustment, as well as supporters of the Community Unit Map. This would have fulfilled all redistricting criteria without diluting the voting power of various communities of interest made up of vulnerable populations and kept various recognized neighborhoods whole.
3. Area Three is discussed under District Ten adjustments.

## **District Seven**

The District 7 lines were adjusted to:

1. **Include** the areas roughly south of Lincoln Way, including all areas in the 2006 MONS SF Find recognized neighborhood of the Inner Sunset and parts of the 2006 MONS SF Find recognized neighborhood of Parnassus Heights. (Area One)
2. **Include** the areas of Golden Gate Park south of Pelosi Dr/MLK Jr Dr and west of Kezar Dr. (Area Two)
3. **Include** all areas east of 19th Ave in the Inner Sunset. (Area Three)
4. **Exclude** parts of the 2006 MONS SF Find recognized neighborhoods of Merced Manor and Lakeshore south of Sloat Blvd. (Area Four)
5. **Exclude** all parts of the 2006 MONS SF Find recognized neighborhoods of Oceanview and Ingleside south of Ocean Ave and east of Ashtor Ave. (Area Five)

Discussion on adjustments to District Seven:

1. Area One is discussed under District Five adjustments.
2. Area Two is discussed under District Five adjustments.
3. Area Three is comparable to the discussion of Area Two under District Five adjustments.
4. Area Four is discussed under District Four adjustments.
5. The exclusion of Area Five reflected public input received at public meetings, including input received from various communities of interest and the Community Unity Map Coalition.

## **District Eight**

The District 8 lines were adjusted to:

1. **Include** the areas roughly south of Frederick St, including all areas in the 2006 MONS SF Find recognized neighborhoods of the Parnassus Heights, Cole Valley and Ashbury



Heights and parts of the 2006 MONS SF Find recognized neighborhood of Buena Vista south of Waller St and east of Masonic Ave. (Area One)

2. **Include** one block north of Waller and east of Laguna, part of the 2006 MONS SF Find recognized neighborhood of Mint Hill. (Area Two).
3. **Exclude** the area west of Guerrero between Duboce and 24th St. (Area Three).
4. **Exclude** the area around Tiffany Street. (Area Four)
5. **Exclude** the area south of San José Avenue, part of the 2006 MONS SF Find recognized neighborhood of Mission Terrace. (Area Five)

Discussion on adjustments to District Eight:

1. Area One is discussed under District Five adjustments.
2. Area Two is discussed under District Five adjustments.
3. Area Three is discussed under District Nine adjustments.
4. Area Four is discussed under District Nine adjustments.
5. Area Five is discussed under District Eleven adjustments.

### **District Nine**

The District 9 lines were adjusted to:

1. **Include** the area west of Guerrero between Duboce and 24th St. (Area One).
2. **Include** the area around Tiffany Street. (Area Two)
3. **Include** the area east of Potrero Avenue and south of Division Street. (Area Three)
4. **Include** the area around Potrero del Sol Park. (Area Four)
5. **Exclude** the area west of Cambridge St, part of the 2006 MONS SF Find recognized neighborhood of University Mound. (Area Five)

Discussion on adjustments to District Nine:

1. The adjustments of Area One, which unified Valencia Street under one district, reflected public input received at public meetings, including input received from various communities of interest, the Valencia Merchants Association and the

Community Unity Map Coalition. The principal desire was to unite the Valencia St Corridor community interest under a single district.

2. The adjustments of Area Two did not reflect any significant public input received at public meetings or via email.
3. The adjustments of Area Three made the 2006 MONS SF Find recognized neighborhood of Mission District whole and fairly reflected public input received at public meetings, including input received from various communities of interest and the Community Unity Map Coalition.
4. The adjustments of Area Four fairly reflected public input received at public meetings, including input received from various communities of interest and the Community Unity Map Coalition.
5. The adjustments of Area Five did not reflect any significant public input received at public meetings or via email and split the 2006 MONS SF Find recognized neighborhood of University Mound.

### **District Ten**

The District 10 lines were adjusted to:

1. **Exclude** the area remaining parts of the 2006 MONS SF Find recognized neighborhood of Showplace Square. (Area One)
2. **Exclude** the area east of Potrero Avenue and south of Division Street. (Area Two)
3. **Exclude** the area around Potrero del Sol Park. (Area Three)
4. **Exclude** the area south of Geneva, part of the 2006 MONS SF Find recognized neighborhood of Crocker Amazon. (Area Four)

Discussion on adjustments to District Ten:

1. The adjustments of Area One were firmly opposed in writing and during public comment at public meetings by many various communities of interest, particularly residents in Potrero Hill-Dogpatch as well as other communities of interest in the Bayview-Hunters Point and Visitacion Valley. There was no significant support for this

adjustment by members of the public and no confirmed community of interest with District 6.

2. Area Two is discussed under District Nine adjustments.
3. Area Three is discussed under District Nine adjustments.
4. The adjustments to Area Four did not appear to reflect any significant public input received at public meetings or via email.

### **District Eleven**

The District 11 lines were adjusted to:

1. **Include** all parts of the 2006 MONS SF Find recognized neighborhoods of Oceanview and Ingleside south of Ocean Ave and east of Ashtor Ave. (Area One)
2. **Include** the area south of San José Avenue, part of the 2006 MONS SF Find recognized neighborhood of Mission Terrace. (Area Two)
3. **Include** the area west of Cambridge St, part of the 2006 MONS SF Find recognized neighborhood of University Mound. (Area Three)
4. **Exclude** the area south of Geneva, part of the 2006 MONS SF Find recognized neighborhood of Crocker Amazon. (Area Four)

Discussion on adjustments to District Eleven:

1. Area One is discussed under District Seven adjustments.
2. The exclusion of Area Two reflected public input received at public meetings, including input received from various communities of interest and the Community Unity Map Coalition.
3. Area Three is discussed under District Nine adjustments.
4. Area Four is discussed under District Ten adjustments.

## Conclusion

Redistricting is fundamentally a political process. It is a process triggered when the decennial census demonstrates that the fair and effective political representation of residents has been compromised due to uneven shifts in population. Previous Redistricting Task Forces understood that working towards the fair and effective representation of all San Franciscans is not a zero-sum game, where some communities must win and others lose.

The California Constitution recognizes living standards and work opportunities as legitimate examples of interests that communities of interest can use to define themselves. Yet the reasonable concerns of renters and working-class communities of interest about being divided and grouped with wealthier, stable communities of interest were called classist or xenophobic by some of members of the RDTF and their concerns consistently dismissed, as the final adjustments to the district lines demonstrate.

This unwillingness to fairly reflect San Francisco's working-class communities of interest ultimately made the final map a partisan map. It needlessly splits many known politically marginalized, vulnerable, and disadvantaged communities of interest made up of vulnerable populations that should have remained in the same district for the purpose of their fair and effective representation. Their representation at City Hall will be diminished for the next decade while amplifying the voice of more stable communities of interest. The RDTF failed the residents of San Francisco at its most fundamental responsibility.

This process shows an urgent need for the redistricting process to be reformed. The author of this statement fully endorses the May 6 joint letter sent to the RDTF by the League of Women Voters of San Francisco, Asian Americans Advancing Justice - Asian Law Caucus and California Common Cause. A copy is attached to this statement.

## Acknowledgements

The author of this statement would like to thank the Department of Elections; John Carroll, Joe Adkins, Wilson Ng, John Tse, Alicia Somera, Eileen McHugh, and Madam Clerk Angela Calvillo from the Office of the Clerk of the Board of Supervisors; Andrew Shen, Ana Flores, and Gus Guibert from the Office of the City Attorney; Agnes Li, Arturo Castenza, and Raymond Borres from the Office of Civic Engagement and Immigrant Affairs; Jamie Clark, Karin Mac Donald, Seth Neil from Q2 Data and Research LLC; all the other City staff for their support; the thousands of San Franciscans that participated in this process; and Luna, the 10th member of the 2022 San Francisco Redistricting Task Force.



## Errata

Any errors are the fault of the author of this statement. Corrections or updates to this member statement will be posted as deemed necessary on the following page:

<https://docs.google.com/document/d/1KYBFBrKgkBqHz2scZaMDG0ojqmh5pDZTY2ikJumaAI4/edit?usp=sharing>

## Attachments

- A. Proposed Ranked Statutory Criteria (draft)
- B. SF Planning Priority Equity Geographies Map, based on the Department of Public Health Areas of Vulnerability
- C. *Recommendations for inclusion in Redistricting Task Force final report.* Letter dated May 6, 2022 from the League of Women Voters of San Francisco, Asian Americans Advancing Justice - Asian Law Caucus and California Common Cause to the 2022 Redistricting Task Force.

## Proposed Ranked Statutory Criteria

Based on the CRC 2020 Playbook, the following criteria are listed in order of priority. Some include related but non-statutory considerations. Lower-priority criteria only apply to the extent that they do not conflict with higher-priority criteria.

- A. **Equal Population:** Limited to +/- 1% population variation between districts unless it is to prevent dividing or diluting the voting power of minorities or to keep recognized neighborhoods intact, in which case it will be +/- 5% population variation between districts.
  - B. **VRA compliance:** Fulfill all Section 2 requirements
  - C. **Contiguity:** Observe absolutely, with appropriate consideration for islands and permanent water crossings.
  - D. **Communities of Interest**
    - a) The statutory requirement is for the adjusted lines to reflect communities of interest.
    - b) Defining communities of interest excludes any consideration of relationships with political parties, incumbents, or political candidates
2. Apply these further non-statutory considerations to COI input:
- a) Where COI submissions conflict, generally give greater weight to those that:
    - (1) Aid in satisfying other statutory criteria, especially higher-ranked ones
    - (2) Seem to represent a larger segment of a community
    - (3) More closely fit a statutory definition of a COI
    - (4) Are given by someone located in that COI
  - b) When an individual COI input submission is unclear or inconsistent with itself, generally give greater weight to the part of that individual submission that is more clear, specific, and central
  - c) Give due but carefully considered weight to COI input given via official resolutions by elected bodies
  - d) Give due but carefully considered weight to input by organizations; be aware of which interests a given organization does and does not represent, and be aware of how locally representative it actually is (or is not)
  - e) It is appropriate to consider COIs known to Task Force Members through data or other documented evidence even if those communities have not submitted COI input
  - f) Sheer quantity of input on a given COI is difficult to weigh; COI submissions are aids to identify and define COIs; therefore,

quantities (whether many or few) should be duly considered but are not decisive

- g) In cases of multiple substantially identical COI input submissions that appear “scripted,” generally evaluate the COI on its own merits, noting the above considerations about quantity of input; do not discount such input merely for seeming “scripted”
- h) Be open to ways a heterogeneous region may nevertheless “share common social and economic interests”
- i) Consider racially framed COI input in the context of all other traditional redistricting criteria, so that race is never a sole or predominating factor (except as needed for VRA compliance)
- j) Give appropriate care and consideration to the possibilities of covert motivations and sources of COI input; factually questionable input can be checked or ignored; use a critical lens to discern attempts to reverse engineer districts; always look for actual evidence
- k) If testimony alone is insufficient to fully define a given COI, it may be helpful to seek current and valid demographic, economic, historic, land-use, and other data (e.g., via reports written by local communities about their own issues).

***E. Recognized Neighborhoods<sup>1</sup>***

**F. Compactness:** Do not bypass nearby areas of population in favor of more distant ones

**G. Exclusions:**

- 1. We will not consider the place of residence of any officeholder or candidate
- 2. We will not draw any district with the intention of favoring or disfavoring any officeholder, candidate, or party

**Some Proposed General Principles:**

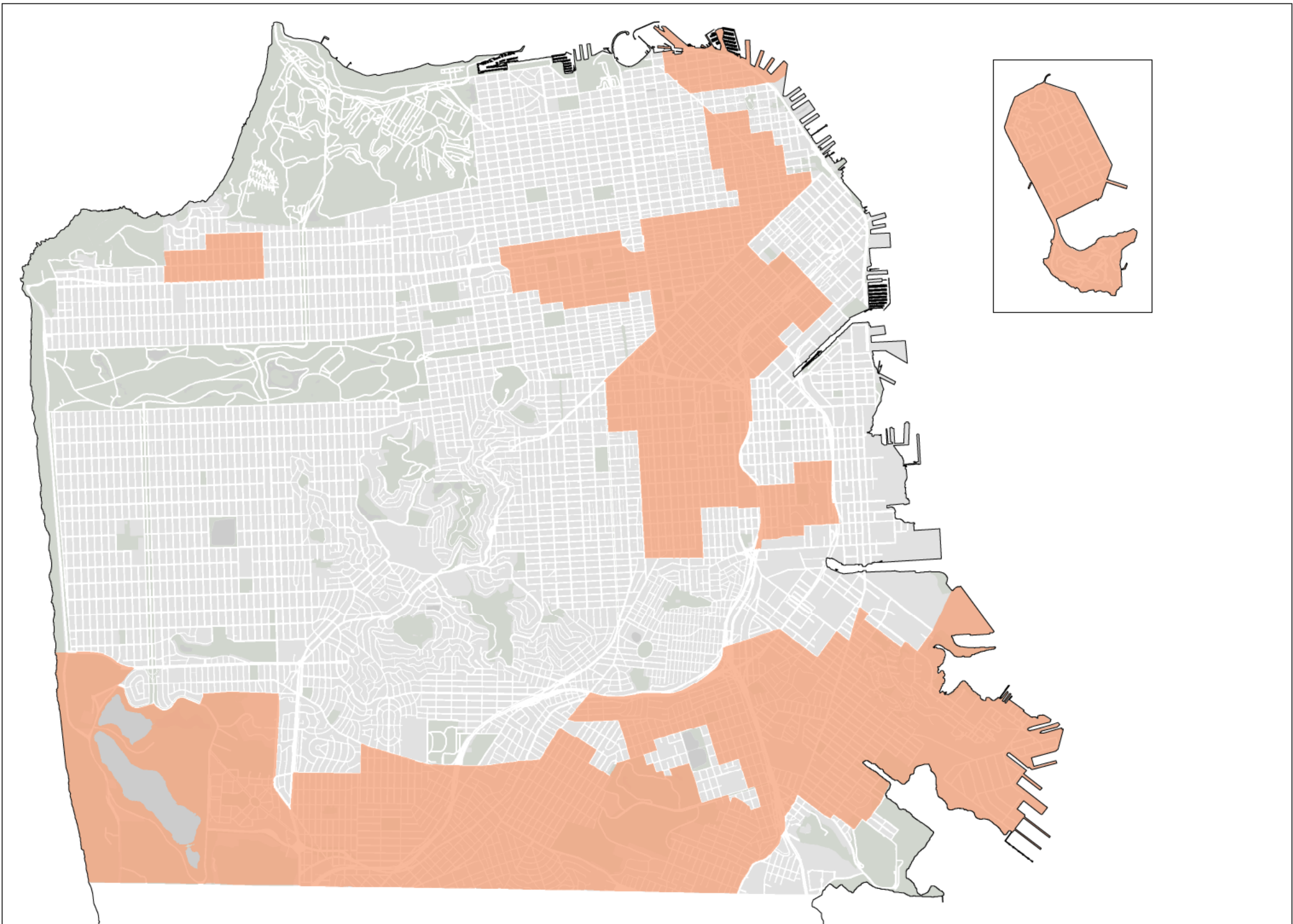
- A. Document all decisions and their reasons, including incremental ones
- B. Consult the most current data available, remembering that the 2012 maps are a decade old
- C. “Share the Gain & Pain” — spread the costs and benefits of mapping decisions, e.g., if a neighborhood must be split in one plan, consider keeping it whole in another plan
- D. Districts should maximize voters’ opportunity to elect representatives of their own choosing.
- E. Remember: Not all COIs have the same level of opportunity when it comes to electing representatives of their own choosing due to differences like wealth, income, educational attainment, etc.

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<sup>1</sup> Actual rank for recognized neighborhoods to be discussed at today’s meeting.

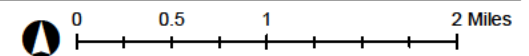


- F. Be open to resolving similar issues in different places in different ways
- G. Remember: "The cleanest option is not always the best" - Justin Levitt
- H. Remember: we are neither in the incumbent protection business nor in the wrecking ball business



Priority Equity Geographies: Department of Public Health Areas of Vulnerability  
SAN FRANCISCO

ATTACHMENT TO STATEMENT OF RDTF MEMBER HERNÁNDEZ GIL





May 6, 2022

VIA EMAIL to [rdtf@sfgov.org](mailto:rdtf@sfgov.org)

San Francisco Redistricting Task Force  
1 Dr. Carlton B. Goodlett Place  
City Hall, Room 244  
San Francisco, CA 94102

**RE: Recommendations for inclusion in Redistricting Task Force final report**

Dear Redistricting Task Force members,

Asian Americans Advancing Justice - Asian Law Caucus (ALC), California Common Cause (CACC), and the League of Women Voters of San Francisco (LWVSF) write to share some of the many opportunities for improving the local redistricting process in San Francisco. Our recommendations are not only based on lessons learned during the city's most recent process, but also reflect best practices used successfully in other jurisdictions. We respectfully request that the Redistricting Task Force include these recommendations in its final report for the benefit of future redistricting bodies and the people of San Francisco.

We strongly encourage the City and County of San Francisco to make every effort to improve all parts of the redistricting process, including how it is convened, the length of the process, mapping criteria and timeline, equitable participation, budget, information accessibility, staff and consultant support, public outreach and engagement, and records retention and reporting.

ALC, CACC, and LWVSF provide these recommendations to help future redistricting bodies carry out a fair, equitable, transparent, and accessible local redistricting process. Many of these recommendations were made in the letters our organizations submitted to the Task Force during its process or in letters to other city bodies before the Task Force

was convened. These are initial recommendations, and ALC, CACC, and LWVSF anticipate providing additional best practices and recommendations in the future.

### Our recommendations:

1. **Allow sufficient time for a fair, equitable, transparent, and accessible redistricting process.** San Francisco’s local redistricting process should take place over a substantially longer period of time than it did this cycle. The San Francisco Redistricting Task Force held its first meeting approximately seven months before its map deadline. In contrast, similarly-sized Bay Area cities started much earlier, providing significantly more time to complete their local redistricting processes than was allotted in San Francisco. Oakland’s Redistricting Commission held its first meeting more than 14 months before its map deadline.<sup>1</sup> San Jose’s Redistricting Advisory Commission began convening 11 months ahead of its map deadline.<sup>2</sup> Starting the redistricting process earlier in San Francisco would provide the necessary time for all steps in the process, including member applications and selection, training, community outreach and education, public input and feedback, and mapping. Based on best practices from other jurisdictions we have monitored, we recommend that San Francisco’s redistricting body convenes at least 12 months before the final map deadline.
2. **Create an accessible and equitable redistricting body application process to support the appointment of a diverse and inclusive membership.** All San Francisco residents should be provided the same opportunity to apply to serve so that the membership of the redistricting body can reflect the diversity of the San Francisco community. Therefore, information about the redistricting body’s application timeline, selection process, the application itself, and all related documents and forms should be available both online and physically. All appointing bodies should follow the same, uniform best practices around transparency, public input, accessibility, and outreach. Appropriate administrative, financial, and community outreach resources should be allocated for promoting the application opportunity to all San Franciscans. Attention should be

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<sup>1</sup>The Oakland Independent Redistricting Commission’s first meeting was held on October 14, 2020 with a deadline of December 31, 2021. City of Oakland Redistricting Commission, Past Meetings, [oaklandca.gov/boards-commissions/redistricting-commission/meetings](https://www.oaklandca.gov/boards-commissions/redistricting-commission/meetings) or on the Internet Archive Wayback Machine at

[web.archive.org/web/20220504223245/https://www.oaklandca.gov/boards-commissions/redistricting-commission/meetings](https://web.archive.org/web/20220504223245/https://www.oaklandca.gov/boards-commissions/redistricting-commission/meetings).

<sup>2</sup> The San Jose Redistricting Advisory Commission’s first meeting was held on February 22, 2021 with a city deadline of January 11, 2022. See City of San Jose Redistricting Advisory Commission, 2020 Redistricting Commission Report and Recommendations, November 18, 2021, [sanjoseca.gov/home/showpublisheddocument/79870/637729314509500000](https://sanjoseca.gov/home/showpublisheddocument/79870/637729314509500000) or on the Internet Archive

Wayback Machine at [web.archive.org/web/20220504223346/https://www.sanjoseca.gov/home/showpublisheddocument/79870/637729314509500000](https://web.archive.org/web/20220504223346/https://www.sanjoseca.gov/home/showpublisheddocument/79870/637729314509500000).

given to doing outreach to the city's various communities of interest about the application opportunity and to reaching San Franciscans of diverse racial groups, ethnicities, cultures, languages, ages, genders, sexual orientations, socioeconomic statuses, citizenship statuses, and other factors. For this redistricting process, the Elections Commission received 33 applications and the Board of Supervisors received eight. It remains unknown to the public how many applications were received by the Mayor. In comparison, the county of Los Angeles received 741 applications for its redistricting commission and the city of San Diego's redistricting commission had over 100 applications.<sup>3</sup> More effort should be made by all appointing bodies to promote the opportunity to apply.

3. **Establish minimum standard qualifications for all redistricting body members.** We recommend qualifications including but not limited to a residency requirement as well as limits on political conflicts of interest such as restrictions on recently running for locally elected office, or having contributed, within a minimum time frame prior to application, a certain dollar amount to a candidate for locally elected office. Such disclosures should be made at the application stage.<sup>4</sup> Redistricting body members should also demonstrate knowledge of and appreciation for the diverse demographics, neighborhoods, and geography of San Francisco, as well as a high standard of personal integrity, civic engagement, and willingness to listen to extensive community input. These and other qualifications should be maintained throughout service.
4. **Support equity in participation in the redistricting body by offering a fair stipend to members.** The absence of financial compensation is, all too often, a major barrier to equitable participation on volunteer commissions and other bodies. It can especially dissuade those who are low-income and/or young from applying to serve due to the prohibitively high costs of commuting and missing work or lack of flexibility in their employment schedules. The city should provide members with a modest but meaningful stipend to facilitate more inclusive and representative membership on the redistricting body. In addition, the city should cover any reasonable expenses that members directly

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<sup>3</sup> Los Angeles County Citizens Redistricting Commission, *Commissioner Selection Process*, March 25, 2021. [redistricting.lacounty.gov/wp-content/uploads/2021/03/CRC-Selection-Process-210127-FINAL-rev-2.pdf](https://redistricting.lacounty.gov/wp-content/uploads/2021/03/CRC-Selection-Process-210127-FINAL-rev-2.pdf) and on the Internet Archive Wayback Machine at [web.archive.org/web/20220504201234/https://redistricting.lacounty.gov/wp-content/uploads/2021/03/CRC-Selection-Process-210127-FINAL-rev-2.pdf](https://web.archive.org/web/20220504201234/https://redistricting.lacounty.gov/wp-content/uploads/2021/03/CRC-Selection-Process-210127-FINAL-rev-2.pdf); County of San Diego Independent Redistricting Commission, *Meet the Commissioners*, [sandiego.gov/redistricting-commission/commissioners](https://sandiego.gov/redistricting-commission/commissioners) and on the Internet Archive Wayback Machine at [web.archive.org/web/20220504203859/https://www.sandiego.gov/redistricting-commission/commissioners](https://web.archive.org/web/20220504203859/https://www.sandiego.gov/redistricting-commission/commissioners).

<sup>4</sup> Financial disclosure requirements should be consistently and equitably applied to all applicants. In this process, the Board of Supervisors' applicants had to submit a Statement of Economic Interest, also known as the Form 700, with their application, while the Mayor's and Election Commission's appointees had to submit Form 700 after being appointed.

incur as a result of their participation in meetings, such as meals, parking, and transit. These stipends and expenses should be paid to members regularly during service, not held until the end. The California Citizens Redistricting Commission (CCRC) offered members modest daily stipends and expense reimbursement for their work on state redistricting, which could be a useful model for San Francisco.<sup>5</sup> Service on a redistricting body is difficult, tiring, and important labor that should be compensated.

5. **Establish a transparent budget encompassing all aspects of the redistricting process.** At no point was a total budget for the redistricting process released to the public, and the Task Force seemed to rely on city departments and agencies allocating funds toward the Task Force's needs on an ad hoc basis. A budget should be created that sufficiently meets all necessary expenses of the city's redistricting process, with opportunity for public input into the budget. The budget should be built on the actual expenditures of the previous redistricting process, with funds added to address shortcomings identified in the Task Force's final report. Additional funding should be provided to obtain datasets and analysis that can assist the redistricting body, provide fair stipends and expense reimbursement to members, and take advantage of new tools and techniques used for mapping, communications, and community engagement that will undoubtedly emerge in the years between redistricting processes. The budget should also include sufficient funding for language interpreters, and consultants for mapping, community outreach, communications, and collecting and analyzing public input to the redistricting body. We also recommend that the city provide modest grants and stipends to nonpartisan community based organizations, such as those that work on Census outreach, to assist with community education and outreach for local redistricting.
6. **Provide sufficient resources for robust language support.** The city must appropriately fund its legally-required interpretation and translation services. We appreciate the language access improvements that were made during the course of the 2021–2022 redistricting process, but in the future, the city must ensure that resources for language support are available from the very beginning of the process. Providing for linguistic inclusion is a legal requirement under both the FAIR MAPS Act and the San Francisco Language Access Ordinance.<sup>6</sup> These requirements include providing interpretation of meetings on request, of the full meeting in addition to incoming public comments, as well as written translations of key information. The redistricting body should translate its outreach materials and advertise prominently that language access services are available.

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<sup>5</sup> For its 2021–2022 redistricting process, members of the CCRC receive \$300 for each day they are engaged in commission business and are eligible for reimbursement of expenses. Cal. Gov. Code § 8253.5.

<sup>6</sup> Cal. Elec. Code § 21628(b), (g); San Francisco Ordinance 27-15.

- 7. Publish a detailed and specific timeline, including key milestones and deadlines, in a timely, public, and conspicuous manner.** A public timeline with specific milestones and deadlines for redistricting must be established much earlier in the redistricting process. Such a timeline is more than a meeting schedule—it sets benchmarks for the redistricting body and alerts the public to when and how people can engage in the process. At minimum, the timeline should include: 1) dates for a robust training schedule for the redistricting body itself, 2) events to educate the public about redistricting, 3) dates for community of interest hearings, 4) the date the first draft map will be released, and 5) key dates during the map revision and finalization process. This timeline should be available on the redistricting body’s website and elsewhere, including presented to the public during each meeting and posted in places accessible to people who lack reliable access to the internet.
- 8. Implement a training curriculum.** By not receiving any substantive training, the Task Force was often missing the context it needed to make important decisions in a consistent, clear, and transparent way. There were times during this redistricting process when it appeared that not all members possessed the requisite understanding of the Task Force’s responsibilities and mapping requirements under local, state, and federal laws. Best practices for maximizing public engagement and creating a fair, accessible, inclusive, and transparent redistricting process were overlooked or implemented late in the process. We echo our and other organizations’ recommendations from the September 16, 2021 joint letter<sup>7</sup> to the Task Force that members should plan and receive a comprehensive set of trainings. At a minimum those trainings should cover the Brown Act, the Sunshine Ordinance and records retention, government ethics rules, the Voting Rights Act, Census data, and redistricting criteria, including communities of interest and relevant sections of the California Elections Code. Other useful training topics include geography and history of San Francisco, redistricting software and tools, public outreach and engagement, communications and media relations, language access, disability access, race and equity, and engaging historically excluded, underserved, and underrepresented communities. Additionally, receiving training from individuals who previously served on redistricting commissions or task forces can be helpful. Other California

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<sup>7</sup> Joint letter of recommendations to the San Francisco Redistricting Task Force from American Indian Cultural District, Asian Americans Advancing Justice - Asian Law Caucus, League of Women Voters of San Francisco, San Francisco Rising, SEIU Local 1021, and Southeast Asian Community Center, September 16, 2021, [drive.google.com/file/d/1taBDc8OHRfAdqbnU1fZfeXXJD-Wh3JNz/](https://drive.google.com/file/d/1taBDc8OHRfAdqbnU1fZfeXXJD-Wh3JNz/) and on the Internet Archive Wayback Machine at [web.archive.org/web/20220504221547/https://img1.wsimg.com/blobby/go/59053b06-508e-4a73-9320-f497b0c97d53/downloads/2021%2009%2016%20-%20Letter%20of%20recommendations%20for%20San.pdf](https://web.archive.org/web/20220504221547/https://img1.wsimg.com/blobby/go/59053b06-508e-4a73-9320-f497b0c97d53/downloads/2021%2009%2016%20-%20Letter%20of%20recommendations%20for%20San.pdf).

redistricting bodies had comprehensive training curricula, including the commissions in San Diego County and the City of Long Beach, as well as the CCRC.<sup>8</sup>

9. **Allow sufficient time for robust discussion of map variations and better engage the public by creating and posting draft maps earlier.** The redistricting body should begin drafting maps earlier in its process. This Task Force shared its first map visualization at its meeting on March 14, 2022, only a month before its deadline. We appreciate that the Task Force held many hearings focused on communities of interest, but the Task Force did not leave itself enough time for full exploration of mapping options. Starting to draft maps earlier in the process has numerous benefits. Public engagement typically increases after draft maps are posted, and both the redistricting body and members of the public have more time to come up with creative solutions and explore a range of map possibilities. In cities like San Francisco, with many communities of interest to balance, having more time to find solutions can lead to better outcomes. Notably, other redistricting bodies gave themselves more than twice as much time for their map revisions.<sup>9</sup>
  
10. **Allow the redistricting body to have authority in the hiring and management of consultants, vendors, and contractors.** The redistricting body should be able to shape the scope of work of consultants, set standards for performance, and negotiate changes in scope as needed. The redistricting body should publicly publish and allow for public comment on any Request for Information (RFI) or Request for Proposal (RFP), vetting and hiring decisions, and related documents concerning consultants, vendors, or contractors supporting the redistricting body.
  
11. **Establish ranked mapping criteria.** During this redistricting process, there was significant confusion among the public and Task Force members about what criteria to prioritize when mapping. We recommend that the redistricting body use clear, ranked criteria to facilitate decision-making and ensure that the appropriate considerations shape the maps. The FAIR MAPS Act, the state redistricting process, and numerous

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<sup>8</sup> Long Beach Redistricting Commission, Training Schedule [longbeach.gov/globalassets/redistricting/media-library/documents/reports/draft-training-plan](https://longbeach.gov/globalassets/redistricting/media-library/documents/reports/draft-training-plan) and on the Internet Archive Wayback Machine at [web.archive.org/web/20220504204415/https://www.longbeach.gov/globalassets/redistricting/media-library/documents/reports/draft-training-plan](https://web.archive.org/web/20220504204415/https://www.longbeach.gov/globalassets/redistricting/media-library/documents/reports/draft-training-plan); County of San Diego Independent Redistricting Commission, Training Continuum [sandiegocounty.gov/content/sdc/redistricting/redistricting-training.html](https://sandiegocounty.gov/content/sdc/redistricting/redistricting-training.html) and on the Internet Archive Wayback Machine at [web.archive.org/web/20220504204529/https://www.sandiegocounty.gov/content/sdc/redistricting/redistricting-training.html](https://web.archive.org/web/20220504204529/https://www.sandiegocounty.gov/content/sdc/redistricting/redistricting-training.html); California Citizens Redistricting Commission, Commissioner Education Panels [wedrawthelinesca.org/commissioner\\_education\\_panels](https://wedrawthelinesca.org/commissioner_education_panels) and on the Internet Archive Wayback Machine at [web.archive.org/web/20220504204638/https://www.wedrawthelinesca.org/commissioner\\_education\\_panels](https://web.archive.org/web/20220504204638/https://www.wedrawthelinesca.org/commissioner_education_panels).

<sup>9</sup> Oakland's commission posted its first draft map more than two and a half months before its deadline. San Jose's commission posted its first draft map three months before the city's deadline.



local jurisdictions with their own charter requirements use detailed ranked criteria.<sup>10</sup> Compliance with the U.S. Constitution, the Californian Constitution, and the federal Voting Rights Act are always required. After that, respect for communities of interest and neighborhoods is the next highest-ranked criterion. Other considerations, such as compactness and following natural or artificial boundaries, should be lower ranked. In addition to setting out ranked criteria, members should discuss their approach to line drawing, including how they will balance competing communities of interest and weigh public comment.

**12. Document the rationale of the mapping decisions in each visualization and draft map.**

The public should be able to understand the thought process that led the redistricting body to draw district lines in certain ways. With every released draft map the redistricting body should describe the decisions made, explain how it applied the ranked criteria, and identify which communities of interest were affected. This information should be documented and accessible, so that members of the public who cannot attend the meetings understand the process. The information should also be made available to the public before the next mapping meeting so people can provide public comments that can be more informed.

**13. Resume in-person outreach and in-district hearings, but maintain an option for remote participation.** This redistricting cycle was heavily impacted by the COVID-19 pandemic, which clearly hindered efforts to engage communities across San Francisco. Barring any public health emergencies, the redistricting body should resume in-person outreach activities and in-district meetings. Meetings should be held in-person at familiar, accessible community spaces that rotate between districts. However, the redistricting body should continue allowing for remote participation via phone and the internet as well.

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<sup>10</sup> See Cal. Elections Code § 21621(c) (establishing ranked criteria for redistricting in charter cities) (“The council shall adopt district boundaries using the following criteria as set forth in the following order of priority: (1) To the extent practicable, council districts shall be geographically contiguous...(2) To the extent practicable, the geographic integrity of any local neighborhood or local community of interest shall be respected in a manner that minimizes its division. A ‘community of interest’ is a population that shares common social or economic interests that should be included within a single district for purposes of its effective and fair representation. Communities of interest do not include relationships with political parties, incumbents, or political candidates. (3) Council district boundaries should be easily identifiable and understandable by residents. To the extent practicable, council districts shall be bounded by natural and artificial barriers, by streets, or by the boundaries of the city. (4) To the extent practicable, and where it does not conflict with the preceding criteria in this subdivision, council districts shall be drawn to encourage geographical compactness in a manner that nearby areas of population are not bypassed in favor of more distant populations.”); Cal. Elections Code § 21500 (ranked criteria for redistricting in counties). See also Cal. Const., art. XXI, § 2(d) (ranked criteria for Senate, Assembly, Congressional, and State Board of Equalization districts); Oakland, Cal., City Charter, Art. II, § 220(D); Long Beach, Cal., City Charter, Art. XXV, § 2506.

**14. Require the retention, reporting, and disclosure of all government records related to redistricting, including personal communications by individual redistricting body members.** Transparency and accountability engender public trust in government, and retention, reporting, and disclosure of government records is an essential part of that transparency and accountability. Rules need to be strengthened to ensure that all personal communications pertaining to redistricting are preserved. Any community of interest testimony or map feedback shared with individual members should be properly posted to the public and shared with the other members. Tools that do not retain communications records or where such records disappear by design should not be used by members for the business of the redistricting body.

Thank you for your attention on this matter, hearing our concerns, and the opportunity to provide recommendations to maintain the integrity of our democracy and ensure that San Franciscans are able to actively participate. We also wish to thank the Redistricting Task Force members once again for their service.

We are available to the members of this Redistricting Task Force and future redistricting bodies, city officials and offices, and others who would like to discuss our recommendations.

Sincerely,

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