

From: [Alec Bash](#)
To: [REG - Redistricting Taskforce](#)
Subject: Comments on Draft Final Redistricting Report
Date: Monday, May 16, 2022 4:35:21 PM

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Greetings,

I thought the draft report very factual and well done.

However, I thought there should have been mention of the RTF's essential requirement to shift populations from District 6, which added 24,000 people to be shifted to other Districts, and from District 10, which added 7,000 people to be shifted to other Districts, in order to keep within the required 5% maximum deviations from the 79,545 population mean for each District.

The Task Force succeeded in this effort, with District 6 population changing from +30.35% to -4.96% deviations from the mean, and District 10 population changing from +8.65% to +3.27% deviations. Also, Districts 1, 3 and 4 had been all at -8.3% deviations or more, and now range from -0.31% to -4.80% deviations.

Keeping populations within the required +/-5% deviations led to significant controversy during the line-drawing of the final weeks. Looking ahead, this requirement will no doubt continue to lead to controversy in the future, despite the ample room for growth the RTF left within District 6 at -4.96% deviation.

The draft report states: *"With the benefit of experience, the Task Force recommends that for future iterations of the Task Force, relevant City bodies should set forth clearer expectations for outreach that more closely align with the needs of the redistricting process."* Future public outreach efforts will need to do a much better job of this.

The draft report also states: *"...the City should establish a temporary department or division to support the Task Force and its needs. Such a department or division will require a paid chief of staff, dedicated administrative support, a media coordinator, and a Sunshine Ordinance expert."* The leader of such a temporary department or division should be responsible for ensuring that the required +/- 5% population deviation receives due respect in public outreach and in the RTF public meetings.

Finally, I applaud the draft report comment regarding the "...racist, prejudiced, vitriolic, and other personal attacks and threats..." that I observed in the line-drawing hearings. In the hundreds of public hearings I've attended both as a public servant and citizen, I have never seen anything like what several redistricting task force members had to endure as they performed their duties on behalf of our City.

Sincerely,
Alec Bash
155 Jackson St
San Francisco, CA 94111

From: [T.Flandrich](#)
To: [REG - Redistricting Taskforce](#)
Subject: Comments on Final Report
Date: Wednesday, May 18, 2022 3:11:15 PM
Attachments: [SF Redistricting Final Report 2022 Chasel Lee Comments.docx](#)

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5/17/2022

SF Redistricting Draft Final Report 2022 Chasel Lee -author

I am writing as a 42 year resident of North Beach, a volunteer community advocate, and a resident who attended all SF Task Force meetings remotely.

What is the purpose of this final report? Is it to describe the actual process from beginning to final map end? Or to advise/make recommendations for future task force? Either way, there seems to be important pieces missing in this report.

My own comments on this are as follows:

<!--[if !supportLists]-->• <!--[endif]-->Starting earlier to actually work on maps, as the 2012 Task Force began this work in January, at least 8 weeks earlier than the 2022 Task Force is one clear suggestion

<!--[if !supportLists]-->• <!--[endif]-->Most importantly, the Task Force needs to clearly explain the criteria used in changing district lines; consistent, clear criteria at each session

<!--[if !supportLists]-->• <!--[endif]-->Mapping: explain justification for changes made for greater transparency-this was not done, which I believe added to confusion, mistrust in process and members

<!--[if !supportLists]-->• <!--[endif]-->Report to the public an updated summary of public comment-ie letters, emails, phone calls received –When a member states that 1100 emails were received, and a member of the public states she had sent 1100 emails from Businesses in support of “making Russian Hill whole” the question I had was, how many are actually residents, 1 Person 1Vote, and what weight is given to the non-residents/businesses. I do recall one meeting where a report back was indeed on the agenda, however several members stated either they did not recall the numbers.

<!--[if !supportLists]-->• <!--[endif]-->We the public know how many called in or were in the room, as the clerk announced this. We could also hear many identify themselves and their home districts, but outside commentary was not shared

If you are not including a complete picture of what the process was, how can you go forward with suggestions for the future? If this report does not include the context in which the Elections Commission hearing was held on April 8, 2022, how can the next Task Force gain insight into what they could do to prevent the same conditions that precipitated the unusual step of the Elections Commission scheduling a hearing, the only body that could provide oversight, a venue to address the large number of constituents who had questions about the Task Force process that were leading to a growing mistrust of this body.

Comments by some task members certainly left me questioning how decisions were actually being made:

<!--[if !supportLists]-->• <!--[endif]-->Vice-Chair Reiner stating that she had never seen so many organizations come together, 19, in support of Russian Hill being moved wholly into district 3, that they have been “so gracious” and “I would like to give them what they want” stood in hard contrast to what I had been hearing for weeks from not only, residents of the TL and SOMA, but also 74 advocacy groups in asking that the TL/SOMA remain together and for reasons found to be in complete alignment with Voting

Act and redistricting guidelines How to interpret this? How is this to be justified?

• And yes, newspaper articles quoting the Chair about outside influences pressured to make certain decisions did nothing to alleviate the growing distrust of the process

• This is but one clear example, and I believe many public comments reiterated this confusion of how decisions are actually reached. So when middle-of-the-night decisions were made, or change of votes on a map, following a joint recess “ to move cars” occurred the frustration and mistrust of this redistricting process grew

• Your report should, at a minimum, record that all of the above precipitated/played a role in the action of the Election Commission hearing. Showing that the TF was actually taking some responsibility would be appreciated and honored

The Covid-19 pandemic certainly presented challenges, but nowhere is it even suggested in this report that due to TF members lack of applying clear, consistent criteria used in creating the new district lines- operating on some unseen/unspoken set that was never made clear to the public- lacking justification for changes to a map, other than using numbers to hurriedly finish before the deadline. I do hope that you will include some of these comments as you formulate the final report. Those you witnessed/participated in the many months of this process, as well as the future Task Force will benefit from your honesty.

I do thank you for your many months of public service!

Sincerely,

Theresa Flandrich

*Word Document attached: same letter

SF Redistricting Draft Final Report 2022 Chasel Lee -author

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My own comments on this are as follows:

- Starting earlier to actually work on maps, as the 2012 Task Force began this work in January, at least 8 weeks earlier than the 2022 Task Force is one clear suggestion
- Most importantly, the Task Force needs to clearly explain the criteria used in changing district lines; consistent, clear criteria at each session
- Mapping: explain justification for changes made for greater transparency-this was not done, which I believe added to confusion, mistrust in process and members
- Report to the public an updated summary of public comment-ie letters, emails, phone calls received –When a member states that 1100 emails were received, and a member of the public states she had sent 1100 emails from Businesses in support of “making Russian Hill whole” the question I had was, how many are actually residents, 1 Person 1Vote, and what weight is given to the non-residents/businesses. I do recall one meeting where a report back was indeed on the agenda, however several members stated either they did not recall the numbers.
- We the public know how many called in or were in the room, as the clerk announced this. We could also hear many identify themselves and their home districts, but outside commentary was not shared

If you are not including a complete picture of what the process was, how can you go forward with suggestions for the future? If this report does not include the context in which the Elections Commission hearing was held on April 8, 2022, how can the next Task Force gain insight into what they could do to prevent the same conditions that precipitated the unusual step of the Elections Commission scheduling a hearing, the only body that could provide oversight, a venue to address the large number of constituents who had questions about the Task Force process that were leading to a growing mistrust of this body.

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- Vice-Chair Reiner stating that she had never seen so many organizations come together, 19, in support of Russian Hill being moved wholly into district 3, that they have been “so gracious” and “I would like to give them what they want” stood in hard contrast to what I had been hearing for weeks from not only, residents of the TL and SOMA, but also 74 advocacy groups in asking that the TL/SOMA remain together and for reasons found to be in complete alignment with Voting Act and redistricting guidelines How to interpret this? How is this to be justified?

- And yes, newspaper articles quoting the Chair about outside influences pressured to make certain decisions did nothing to alleviate the growing distrust of the process
- This is but one clear example, and I believe many public comments reiterated this confusion of how decisions are actually reached. So when middle-of-the-night decisions were made, or change of votes on a map, following a joint recess “ to move cars” occurred the frustration and mistrust of this redistricting process grew
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I do thank you for your many months of public service!

Sincerely,

Theresa Flandrich

From: [Robert Frank](#)
To: [REG - Redistricting Taskforce](#)
Subject: Final Map Report comments
Date: Sunday, May 15, 2022 1:26:04 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

VIA EMAIL to rdtf@sfgov.org
San Francisco Redistricting Task Force
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102

Gentlepersons:

My congratulations on your work in redistricting supervisorial districts.

I am commenting on the draft final report to accompany the map.

There is no explanation as to why the report outlines “changes” to the map from 2010.

If the 2010 map had an accompanying report describing communities of interest identified in 2011, that might make some sense, but there is no requirement that you start with the old map, and no reference in the report to the communities identified in the 2010 redistricting.

On the other hand, the old map, so far as I know, was not subject to judicial review.

I can understand why the supervisorial appointees did not approve the map; they didn’t understand that there was no presumption for maintaining the previous boundaries once it was determined that the old boundaries couldn’t be kept.

Further, there is no explanation as to the specific minority vote dilution or neighborhood integrity concerns that made it necessary to vary district population from a 1% deviation. A single vote is worth less in a district with greater population. That is not “one person, one vote”.

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Robert Frank

From: [Joyce Nakamura](#)
To: [REG - Redistricting Taskforce](#)
Subject: FINAL REDISTRICTING PROPOSAL
Date: Friday, May 13, 2022 10:29:59 PM

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At this point, what's done is done. The RTF make their decision on re-districting.

What is needed is what folks are doing already – how to form these task forces in the future, etc.

My main objection is attaching the Tenderloin to District 5. That's the decision, there is nothing we can do about it. The Task Force will have to live with any consequences.

My only regret is that the Task Force was not transparent on their decision, i.e., why did Task Force members vote to include the Tenderloin with District 5? And why did you oppose the split of the transgender cultural district and splitting off the Tenderloin from SOMA that it had historic connections with?

Sent from [Mail](#) for Windows

From: [Will Jarrett](#)
To: [REG - Redistricting Taskforce](#)
Subject: Individual task force statements
Date: Thursday, May 12, 2022 3:44:20 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Redistricting Task Force,

I hope you are well.

I read the [draft final report](#) this afternoon with interest. Do you know when the appendices are going to be published? I am particularly interested in reading the statements from individual task force members.

If there's any chance to hear from you today, I would be really appreciative. Many thanks for your time.

All the best,
Will

From: [Alison Goh](#)
To: [REG - Redistricting Taskforce](#)
Cc: [Julia Marks](#); alozano@commoncause.org; [Breed, Mayor London \(MYR\)](#); [Board of Supervisors, \(BOS\)](#); [Calvillo, Angela \(BOS\)](#); [Arntz, John \(REG\)](#); [Cityattorney](#); [Commission, Elections \(REG\)](#); [Pelham, Leeann \(ETH\)](#); [Ethics Commission, \(ETH\)](#); [Engagement, Civic \(ADM\)](#); [SOTF, \(BOS\)](#)
Subject: Recommendations for inclusion in Redistricting Task Force final report
Date: Friday, May 6, 2022 11:51:49 AM
Attachments: [2022 05 06 - Letter of Recommendations - for redistricting final report from ALC CACC LWVSF.pdf](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Redistricting Task Force members,

Asian Americans Advancing Justice - Asian Law Caucus, California Common Cause, and the League of Women Voters of San Francisco write to share some of the many opportunities for improving the local redistricting process in San Francisco.

Attached is a letter with our recommendations based on lessons learned during the city's most recent process and 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.

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 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,

Alison Goh

Alison Goh
President
president@lwvsf.org
pronouns: she/her

League of Women Voters of San Francisco

582 Market Street, Suite 615, San Francisco, CA 94104

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May 6, 2022

VIA EMAIL to 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.¹ San Jose’s Redistricting Advisory Commission began convening 11 months ahead of its map deadline.² 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

¹The 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 or on the Internet Archive Wayback Machine at

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

² 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 or on the Internet Archive

Wayback Machine at 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.³ 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.⁴ 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

³ 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 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; County of San Diego Independent Redistricting Commission, *Meet the Commissioners*, 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.

⁴ 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.⁵ 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.⁶ 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.

⁵ 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.

⁶ 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 letter⁷ 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

⁷ 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/ 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.

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

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.⁹
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

⁸ Long Beach Redistricting Commission, Training Schedule 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; County of San Diego Independent Redistricting Commission, Training Continuum 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; California Citizens Redistricting Commission, Commissioner Education Panels 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.

⁹ 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.¹⁰ 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 restricting body should continue allowing for remote participation via phone and the internet as well.

¹⁰ 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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Members, Board of Supervisors
Angela Calvillo, Clerk, Board of Supervisors
John Arntz, Director, Department of Elections
David Chiu, City Attorney
Members, Elections Commission
LeeAnn Pelham, Executive Director, Ethics Commission
Office of Civic Engagement & Immigrant Affairs
Members, Sunshine Ordinance Task Force

From: [Dai, Cynthia \(REG\)](#)
To: [REG - Redistricting Taskforce](#)
Subject: Your report and invitation for comment
Date: Thursday, May 19, 2022 5:20:55 PM
Attachments: [SF Redistricting Discussion Document.pdf](#)

Hi, RTF Members--

Thanks for putting together a final report (which I don't think you're required to do). My main comment is that there is a lack of clarity about how your maps kept together or split communities of interest about which you received public testimony. Section 7 mentions "geographic issues" considered, but the report neither describe communities of interest considered, whether they were kept whole, split, and why, and if similar ones were grouped together for purposes of effective representation. Given the hours the RTF spent listening to public testimony, it would be helpful for the public to understand why you considered but ultimately chose to reject certain community proposals (such as the "community unity map") that differed from but adhered to the Charter requirements as well as the redistricting criteria outlined in the report.

I also wanted to share a discussion document I presented at the Elections Commission last night to begin consideration of recommendations to improve and redesign San Francisco's Redistricting process. Some of the flaws I point out are echoed in your report as well. We agreed to kick off a series of presentations from experts to inform our discussion to develop specific proposals for a Charter amendment based on best practices from other independent state, county and city citizens' redistricting bodies. We would welcome any reflections from your recent experience on what might work best for our City.

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Cynthia Dai

San Francisco Elections Commissioner

San Francisco Redistricting vs. Best Practices Redistricting Reforms

Commissioner Cynthia Dai prepared this document to spur discussion, but it may not be comprehensive. It is based on her 10+ years of experience as an inaugural 2010 California Citizens Redistricting Commissioner and educational speaker and trainer for reformers in 11 states and 11 cities and counties with citizens' commissions.

The goal of redistricting reform is to eliminate gerrymandering and ensure a fair and transparent process that strengthens democracy. Election reforms like San Francisco's Instant Runoff Voting (a form of ranked-choice voting) and multi-member districts are also known to improve democratic outcomes. San Francisco was on the vanguard when it established the Redistricting Task Force (RTF) at the same time Arizona's Independent Redistricting Commission was formed, but has since been surpassed with process improvements by California, other states, and municipalities. Given the chaos of the most recent redistricting cycle, it is timely to consider how to incorporate some of these best practice designs to improve San Francisco's RTF via charter amendment before the next cycle.

Element	SF	Best Practices	Exemplars	Comments
Type	Independent citizens commission	Independent citizens commission	AZ IRC, CA CRC, MI ICRC are all citizen bodies with final decision authority and control over their own staff and budget. The CA Legislature was required to adequately fund the CRC. The cities of Berkeley and Long Beach, San Diego & LA Counties are local examples.	While the RTF determines the final map w/out oversight, it does not have independent resources or control of staff or budget. In addition, other departments on which the RTF relied did not necessarily receive budget augmentation. This has been problematic for ensuring adequate language access and scheduling meetings for example.
Outreach and representative candidate pool	Limited to standard City channels. No requirement for diverse candidate pool.	Extensive and broad outreach to diverse communities to ensure diverse pool	CRC, ICRC: extensive outreach including ethnic media and CBOs resulting in large pool. Finalist pool required to be representative.	Only 35 applicants to SFEC. Only 8 applicants to BOS. Unknown number of candidates considered by Mayor. Some applied to multiple appointing authorities.

<i>Selection criteria and process to reduce political influence</i>	Appointed by Mayor, BOS, and SFEC by different processes without standard qualification criteria or ban on conflicts of interest	Vetted for conflicts of interest and transparently appointed by nonpartisan, independent body and/or randomly selected in standard process	CA CRC finalists vetted by CA State Auditor in public process, 8 randomly selected who choose 6. MI ICRC members selected randomly and publicly after basic qualification. Similar processes in Berkeley, Los Angeles County.	BOS appoints 3 members despite direct vested interest. Mayoral appointment process is not public, and the Mayor might also be considered an interested party. Timing of financial disclosures and qualification criteria inconsistent between appointing authorities.
<i>Composition and diversity</i>	9 members: 3 selected by each appointing authority. No diversity or representation requirements	Balanced composition and large enough to allow for representative diversity. Requirements for diverse representation.	CA CRC 14 members: multi-partisan, with requirement to represent CA by gender, race/ethnicity, socioeconomic status and geography. Local commissions often require representation from each district as well as racial/other diversity.	Large enough (9 members for 11 districts). Although no requirement for diverse representation, past RTFs have been diverse. However, lack of compensation may limit participation by those of lesser means.
<i>Training and preparation</i>	City Attorney wrote several legal memos to the RTF. Both the City Attorney & mapping consultant offered to train the RTF.	Extensive legal and practical training, much of it required	AZ IRC, CA CRC, MI ICRC all provided extensive training for their Commissioners, including by past Commissioners. Most local commissioners also received training.	Multiple public comments about the lack of training. Untrained citizen members can expose the City to lawsuits, result in unequal participation, and destroy faith in elections due to a poorly-run process. Was training budgeted?
<i>Redistricting criteria</i>	Population equality within 5%, VRA (assumed), communities of interest (not defined)--no ranking	Ranked standard redistricting principles (federal, state, local law)	CA CRC: population equality based on case law, VRA, contiguity, communities of interest [political geography], compactness, prohibition on political considerations. MI ICRC elevated communities of interest.	The 5% population equality requirement is more restrictive than the Equal Protection Clause and may force splits. The public and even RTF members reported being unclear about why lines were reversed/changing during the process and what was being prioritized.

Transparency	Public meetings governed by Sunshine ordinance & Brown Act, but no ban on discussing redistricting matters outside a public meeting	Bias toward transparency. Ban on ex-parte communication. Extended public notice period for maps. Required written rationale for maps.	CA CRC's restrictions exceeded Bagley-Keene (Brown Act at state level), requiring 14-day notice and published report with the rationale for each district. Berkeley IRC also bans members from discussing redistricting matters outside a public meeting.	This RTF reversed an 8-1 vote on a map at 2:53am. Members allegedly had private meetings with groups and even elected officials. The media reported on "opaque processes" and private texts.
Draft Maps and timeline	None required. Only final deadline stipulated	Draft map required several months before final map.	CA CRC: June 15 Draft Map and Aug. 15 Final Map deadlines. Some local laws require a minimum # of public hearings prior to mapping.	This RTF did not start drawing lines until a month before the deadline and did not publish an official draft map with sufficient time for the public to consider and propose creative alternatives. Consider a deadline tied to Census data availability.
Voting to approve maps	Simple majority	(Special) supermajority	CA CRC: at least 9 w/3 of 5 Ds, 3 of 5 Rs, 3 of 4 Is. Long Beach requires 2/3 majority to choose final 4 plus alternates.	This RTF only achieved the barest majority vote, reducing confidence in the result. A supermajority requirement encourages collaboration and creative problem-solving and may ensure minority rights.
Recourse if no agreement on final map	Unclear	Judges decide	CA CRC: CA Supreme Court appoints special masters	This RTF exposed the City to a lawsuit due to failure to meet the deadline. A well-designed backup plan can be motivating if not preferential to the body's success.
Replacement/removal of members	RTF members serve at the pleasure of their appointing authority	Removal only due to neglect of duty or gross misconduct. Must be replaced with a vetted, qualified alternate.	CA CRC: Commissioner can only be removed by Governor w/concurrence of 2/3 of Senate. Must be replaced with a finalist candidate.	The public came to SFEC to remove its appointees. Unclear how we would have replaced any members had we chosen to remove.