

County of Los Angeles Citizens Redistricting Commission  
c/o Gayla Hartsough, Ph.D, Executive Director  
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Re: Los Angeles County Mapping Concerns

Dear Members of the County of Los Angeles Citizens Redistricting Commission:

On behalf of League of Women Voters of Los Angeles County (LWV) and Asian Americans Advancing Justice – Los Angeles (Advancing Justice – LA), we write regarding several concerns we have observed that we believe undermine the value of the continuing redistricting process. It is not too late to address most, if not all, of the items enumerated here.

**Accessibility of ARCBridge Representatives Has Been Insufficient**

ARCBridge Consulting Services was hired to provide demographic support for the Commission’s redistricting efforts. As part of their services, they promised to provide someone locally for all meetings. As the COVID-19 pandemic continues to limit travel and in-person activities, ARCBridge’s consultants were permitted to work remotely from their home location in the Washington, DC area. While we support efforts to protect individuals from unnecessary COVID-19 exposure and to limit unnecessary travel that might exacerbate the spread of the disease, ARCBridge’s consultants should be available and alert during Pacific Time meeting hours so that they and stakeholders can meaningfully engage with one another.

**Representation of Communities of Interest (COI) Testimony in the Mapping Tool Does Not Accurately Reflect Testimony**

We appreciate the incorporation of COI testimony in the publicly available mapping tool. However, the incorporation of that testimony has been fundamentally flawed and we ask the Commission to direct ARCBridge to correct the following flaws listed below.

Primarily, ARCBridge should have taken the COI testimony that was provided and translated them into GIS polygons as accurately as possible. If commenters give streets, the borders of the GIS polygon should match the streets. If commenters give school districts, cities, sub regional Council of Governments (COG), or any other governmental subdivision, then the polygons should match the boundaries of those entities.

In creating GIS polygons from COI testimony, ARCBridge should refrain from editorializing the testimony given or enforce a non-overlapping rule on COI polygons. Los Angeles is famous for our overlapping cultural landscape. We experience places differently based on cultural markers that resonate with us. It is not unusual in Los Angeles County for the perceived communities of different groups to overlap with one another. For this reason, COI boundaries from public testimony must be perceived as

soft-edged and allowed to overlap as necessary. Where different people and groups differ on COI boundaries, ARCBridge should not make the decision about where to place the COI boundary.

Users of the mapping tool are already able to select where we want to overwrite a boundary and where we want to protect it. The ability to lock / unlock district boundaries allows users to make more incremental changes, and prioritize which COI boundaries they wish to preserve. Enforcing a non-overlapping rule on the COI polygons is editorializing the testimony.

In summary, ArcBridge should be directed to simply translate the COI testimony given. COI polygons for different communities (and the people within them) will overlap in some places. Let the commission and the public make their own decisions.

### **The Mapping Tool is Missing Crucial Features**

The mapping tool provided includes large amounts of data useful for creating and reviewing maps for redistricting, and we thank the Commission for ensuring the inclusion of the data present so far, such as CVAP. There are important features that should be included in the mapping tool but are not.

The decision to remove users' ability in the mapping software to select census tracts, block groups and individual blocks jeopardizes the process. Users have gone from having 90,000 blocks to choose from to only 3,000 Redistricting Units (RDUs), which grossly reduces the variety and accuracy of maps that can be created and makes it impossible to match COI maps that are not based upon the RDUs. Furthermore, attempting to use the tool for local-level redistricting is impossible with RDUs as they are too large for local-level subdivisions. LWV volunteers had used the mapping tool to create sample redistricting maps for city council districts prior to the removal of this feature set. LWV and others had hoped to use the mapping tool for other district maps as well, but cannot due to RDU size.

### **The Mapping Tool does not Incorporate Datasets Requested by the Public**

COI testimony repeatedly brought up pollution and rent burden. LWV and others have asked for the tool to add publicly-available and regulatory-quality datasets such as CalEnviroScreen and Affirmatively Furthering Fair Housing Data. The state of California has vetted the data and makes them downloadable in formats used by the ESRI mapping software. These data layers are necessary to create maps, test hypotheses, and assess the fairness and effectiveness of the maps.

Commissioners have been concerned that the maps submitted so far are too heavily focused on race. Currently, the mapping tool has mainly racial data. *In a data-driven process, the data you put in determines the results.* We request the addition of more environmental, housing and health data to improve the process and the results.

On September 22, 2021, LWV asked via email for inclusion of 3 datasets available in ESRI-compatible formats for easy addition:

<https://oehha.ca.gov/calenviroscreen/report/draft-calenviroscreen-40>

<https://affh-data-resources-cahcd.hub.arcgis.com/>  
<https://www.naphsis.org/usaleep>

Commissioners discussed the datasets and directed staff to add them. Despite the Commissioners request, these data sets have not been loaded into the mapping tool. It appears the staff misinterpreted this request and provided links to the datasets (and the census data they removed). The public is not trained to download the datasets, upload them, make them part of the map and activate them. Staff should prepare the environmental and housing data the same way they made the CVAP data available, preloaded into the mapping tool, ready to use.

The block-level data, census block groups and census tract data along with the environmental variables are still not included as of November 24, 2021. Until this data is loaded into the mapping tool, the public cannot select areas using these variables to create and evaluate redistricting maps.

### **ARCBridge Has Not Provided All of the Services Expected**

As the demographic consultants for Los Angeles County, ARCBridge should have generated maps for the Commission and the public to illustrate different approaches to dividing up the county. These maps should have been created so that the strengths and weaknesses of the different approaches could be discussed and commented upon by the commissioners and the public. This is a standard service by demographic consultants that assist entities with redistricting. By not making any maps, ARCBridge has effectively crowd-sourced their job. ARCBridge should be instructed to provide supplemental maps showing different tactics to consider when subdividing divisions like Los Angeles County for the Commission's and public's consideration.

Sincerely,

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