



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](http://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](http://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](http://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](http://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](http://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](http://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](http://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](http://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](http://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](http://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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