



Sent Via Email

January 26, 2021

To: County of Los Angeles Citizens Redistricting Commission
CommServ@bos.lacounty.gov

Re: Item 6b (Bylaws) of the January 27, 2021 Commission Meeting Agenda

Dear Commissioners:

Below please find suggested edits to the draft Bylaws for the County of Los Angeles Citizens Redistricting Commission (“CRC” or “Commission”). Many of the undersigned organizations have worked in previous redistricting cycles and/or are currently involved in advocacy before the California Citizens Redistricting Commission (“CCRC”) and other commissions throughout the state. Our comments are based on prior experience and our understanding of redistricting commission best practices and will help ensure transparency and robust public participation in the redistricting process.

Suggested Edits to the Draft CRC Bylaws

- **Article I. Authority:** We suggest that the bylaws include “CRC” in addition to “Commission” as a short form for the County of Los Angeles Citizens Redistricting Commission given that CRC is used throughout the bylaws.
- **Article II. Purpose:** The bylaws provide that the Commission is going to draw the boundary lines of the “five single-member supervisorial districts,” but SB 958 is silent on the number of districts that the Commission is going to draw. We suggest that the bylaws track the statutory language to read: “The Commission shall adjust the boundary lines of the supervisorial districts of the County of Los Angeles Board of Supervisors (Board) following each federal decennial census.”
- **Section 4.04 Conduct:** We suggest that the Commission replace “him or herself” with “themselves.” This will avoid misgendering future Commissioners who use they/them/theirs pronouns.
- **Section 4.07 Vacancy:** We suggested deleting the reference to alternates in subsection (a)(3)(ii). The Commission agreed not to select alternates during its January 20, 2021 meeting.

- **Section 4.08 Communications:** We suggest that the bylaws follow the CCRC’s practice¹ and ban Commission members and staff from communicating outside of a public meeting with any member of the public, organization, or interest group about line drawing. All communications about line drawing, whether substantive or not, should be treated as public comment and either be submitted during a public meeting or comply with Section 4.08(e) and be posted on the Commission website.

- **Section 5.03 Election of Officers:** We suggest adding that new officers may be selected by a quorum of the Commission after the terms of the initial officers expire or if an officer vacates their seat.

- **Section 6.01 Brown Act:** This section requires that the Commission comply with the Brown Act. The Brown Act requires legislative bodies to post agendas at least 72 hours ahead of public meetings. We urge the Commission to provide the public with more than 72 hours’ notice for its business meetings, particularly at this stage in the process. Reviewing, assessing, and preparing public comment on Commission agendas, materials, and maps is a time intensive process. We strongly suggest that the Commission include in its bylaws a notice requirement of 7 to 14 days to give the public sufficient time to participate in Commission meetings. The CCRC provides 14 days’ notice, and we find that this is sufficient time for our organizations to learn about the meeting, review documents, and prepare testimony for the CCRC. We recognize that a shorter notice period may be necessary closer to the deadline to adopt a map and suggest a 72-hour notice requirement within 28 days of the deadline to adopt a map. This is the approach taken in AB 1276.

- **Section 6.03 Regular Commission Meetings:** We suggest that this schedule apply up until the time when the final map has been filed with the county elections official.

- **Section 6.07 Committees:** Where possible, we suggest that the Commission treat subcommittee meetings as public meetings and provide the public with notice and opportunities to participate in these meetings.

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¹ The Government Code provides that CCRC Commissioners and staff “may not communicate with or receive communications about redistricting matters from anyone outside of a public hearing. This paragraph does not prohibit communication between commission members, staff, legal counsel, and consultants retained by the commission that is otherwise permitted by the Bagley-Keene Open Meeting Act or its successor outside of a public hearing.” Gov’t Code § 8253(a)(3). CCRC Counsel has interpreted this to mean that CCRC Commissioners may talk to *experts* to learn about redistricting principles but not to the general public about line drawing.

If you have any questions about our recommendations, please feel free to reach out to any of the undersigned. Many of us will also attend this week's Commission meeting and will be happy to answer any questions at that time.

Best,

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