



October 27, 2021

TO: 2021 Los Angeles City Council Redistricting Commission
redistricting.lacity@lacity.org

Transmitted via electronic mail

2021 Los Angeles City Council Redistricting Commission and Staff
Los Angeles City Hall
200 N. Spring Street, Room 275
Los Angeles, CA 90012

CC: Los Angeles City Council, City Attorney, City Controller, and Mayor of Los Angeles
Los Angeles City Hall
200 N Spring St,
Los Angeles, CA 90012

Re: Recommendation For the City of Los Angeles to Move To An Independent Redistricting Commission.

Dear Honorable Commissioners and Staff,

California Common Cause is a nonpartisan, grassroots organization dedicated to upholding the core values of American democracy. We have played a key role in bringing fair redistricting to California communities by passing both statewide and local reforms to make redistricting more transparent, independent, inclusive, and accessible.

We have been monitoring the 2021 Los Angeles City Council Redistricting Advisory Commission [hereinafter referred to as the “Advisory Commission”] since its appointment. We are committed to ensuring that the Advisory Commission and the Los Angeles City Council [hereinafter referred to as “City Council”] employ a redistricting process that prioritizes community voices, inspires full public trust, and results in maps that allow fair representation for the next decade.

We are writing to call for the establishment of a truly Independent Redistricting Commission in the City of Los Angeles. Specifically, we ask this Advisory Commission to acknowledge what has been extensively reported by the media and witnessed by the public: that

your current process, which so many of the commissioners have put copious time and energy into, is being exploited by the City Council in order to preserve its own power over Los Angeles politics. Further, we ask that you recommend in your majority report that the City of Los Angeles establish an Independent Redistricting Commission for the 2030 redistricting cycle and beyond.

The City Council, Mayor of Los Angeles, City Attorney, and City Controller [hereinafter referred to collectively as “elected officials”] have manipulated the redistricting process for their own political gain and interests, at the cost of a fair and transparent process. This is evidenced by their: (1) appointment of longtime political actors and allies to the Advisory Commission, indicating to the public and press that commissioners were little more than political proxies for the official appointing them; (2) capricious and irresponsibly sudden replacements of Commissioners, especially during the mapping process, leading to 11th-hour revocation of commissioners who had heard countless hours of public testimony and introduction of commissioners who appeared instructed to engage in political warfare in commission spaces; (3) use of City Council’s own demographers to draw district lines outside of the Advisory Commission; (5) copious *ex parte* communications with Commissioners, especially during the final weeks of the mapping process; and (6) undermining of the 2011 Advisory Commission’s process in favor of adoption of a district map developed by City Council, a pattern that City Council has confirmed it will continue. It is long overdue that the City of Los Angeles join the Counties of Los Angeles and San Diego, the Cities of San Diego, Long Beach, Sacramento, Oakland, and many others, as well as the State of California, in establishing an independent redistricting process free of political influence and interference.

I. Despite the Appointment of a Twenty-One Member Advisory Commission, City Council Retains Absolute Control Over the Redistricting Process and Exploits it to City Council’s Benefit

Despite the good faith efforts of many commissioners in bringing independence and integrity to a process that should result in community-driven maps, the Advisory Commission has become mere cover for the City Council to engage in business as usual, behind closed doors, and without regard for resident testimony.

While City leadership may have had good intentions when it established the City Council Redistricting Commission prior to the 2000 decennial census, the impact has not matched the intention. As the name implies, this Advisory Commission was assembled “to *advise* the Council on drawing of Council district lines” and has no power beyond making recommendations.¹ Because this Advisory Commission is empowered only to “advise” the City Council on the drawing of district lines, it has no deciding authority or control over the redistricting process beyond its ability to make recommendations.² In short, this means that the true power over the

¹ Los Angeles City Charter, article II, section 204 (hereinafter referred to as “Charter Section 204.”)(emphasis added).

² Charter Section 204 (b).

redistricting process in Los Angeles rests and remains with the City Council itself, the same political body which has the most self-interest in redistricting.³

Since its creation, City Council has wielded the Advisory Commission as a weapon to gerrymander wealthy areas to secure a campaign donor base;⁴ enact political retribution against opponents and rivals;⁵ and as a means for securing their reelection or the election of a political ally or aide.⁶

However, the tactics outlined above are not solely problems of past redistricting cycles. They operate as a political playbook that City Council continues to employ when redrawing political boundaries. Once again, City Council has signaled that it will exploit the redistricting process to gerrymander wealthy areas and assets to secure a donor base;⁷ enact political

³ Charter Section 204 (b).

⁴ See, e.g., LOS ANGELES TIMES, *Op-Ed: How Jose Huizar's Alleged Crimes May Have Been Aided By Redistricting* (Aug. 10, 2020) (“You don’t have to look far to see how the redistricting process figures into the corruption charges. Giving Huizar the keys to downtown meant his district was filled with high-priced development projects — and wealthier targets to hit up for campaign cash and, if federal prosecutors are right, luxury trips, lavish meals, expensive suits and hundreds of thousands of dollars in cash. The land underneath the development projects for which he allegedly received bribes was added to his district in the 2012 redistricting.”); See also, LOS ANGELES TIMES, *Editorial: For a better L.A. City Council, Make It Bigger* (Mar. 5, 2012)(Los Angeles council districts “secure districts and fundraising opportunities for favored incumbents”).

⁵ See, e.g., LOS ANGELES TIMES, *Wesson Denies Newly Drawn Council Districts are Payback* (Feb. 17, 2012) (“[City Council President Herb] Wesson’s appointee on the redistricting panel, working with representatives of Mayor Antonio Villaraigosa and Councilman Jose Huizar, formed a voting bloc with several other commissioners. During a nine-hour meeting that ended after 1 a.m. Thursday, they voted to strip Baldwin Hills, Leimert Park and other neighborhoods from the South L.A. district represented by Councilman Bernard C. Parks, who like Perry has been at odds with Wesson.”); See also *DAILY BREEZE, L.A. Council Approves New Redistricting Map* (Mar. 16, 2012) (Los Angeles city council incumbent allegedly punished with worse district for not supporting council member’s bid for council presidency).

⁶ See, e.g., LOS ANGELES TIMES, *Editorial: For a Better L.A. City Council, Make It Bigger* (Mar. 5, 2012) (Los Angeles council districts drawn to “pave the way toward election for various aides and [politicians]”).

⁷ See, e.g., LOS ANGELES TIMES, *Two L.A. Council Members Fight Over Who Gets USC as Redistricting Heats Up* (Oct. 20, 2021) (“The city’s Redistricting Commission, charged with redrawing council district boundaries, brought the issue to a head Monday night, voting 11 to 10 to move USC out of Councilman Curren Price’s district and into the one represented by Councilman Marqueece Harris-Dawson . . . Price and his allies say they are determined to keep billion-dollar assets from being pulled out of the 9th District, describing them as essential to the area’s economic prosperity.”).

retribution against opponents and rivals;⁸ and as a means for securing their reelection or the election of a political ally or aide.⁹

Overall, the lack of final power over the redistricting process has created an Advisory Commission whose primary purpose is unfortunately to serve as a political cover for City Council and its allies as they pervert a process that ought to center the public and Los Angeles's many diverse communities.¹⁰

II. The Lack of Clearly Outlined Qualifications and Disqualifications for Commissioners Allows Elected Officials to Appoint Loyalists and Longtime Political Figures Who Will Protect the Political Interests of their Appointing Authorities

Since the Los Angeles City Municipal Code is silent on specific criteria for appointment of Commissioners, and places sole appointing authority with the City Council and other elected officials, the result is a system that allows the body with the most self-interest in the redistricting process to be in complete control of who is appointed to the Advisory Commission.

While federal, state, and local law are clear in defining criteria, considerations, and processes the Advisory Commission must or may consider *when* developing district maps, they are silent on the criteria, considerations, and processes elected officials must or may consider when appointing the Commissioners *who* will develop those district maps.¹¹ Except for the strict

⁸ See, e.g., LOS ANGELES MAGAZINE, *Is Nithya Raman About to Lose Her Seat?* (Sept. 30, 2021) (“Today, a commission busy redrawing the boundaries of Los Angeles City Council districts is threatening to make most of Raman’s hard-won Fourth District disappear . . . One insider put it in social darwinistic terms suitable for the once-in-a-decade process: ‘Nithya lacks in relationships, and she’s not someone her colleagues are afraid of.’ . . . Council District 4 is not the only area where the extreme makeovers proposed for some districts have drawn complaints. Under the draft map, Councilman Paul Krekorian’s district based in the East Valley would be moved into neighborhoods he does not currently represent, the Times reports.”); See also LOS ANGELES TIMES, *Editorial: For a Better L.A. City Council, Make It Bigger* (Mar. 5, 2012) (Los Angeles council districts drawn to “pave the way toward election for various aides and [politicians]”); See also KCRW, *LA Redistricting: City Council’s Nithya Raman and Paul Krekorian Could Lose Their Constituents* (Oct. 05, 2021) (“If approved, the map would drastically redesign districts represented by Paul Krekorian, who is based in the San Fernando Valley, and Nithya Raman, a newcomer to City Hall who represents much of the Hollywood Hills. And neither are happy about it.”).

⁹ See, e.g., LOS ANGELES TIMES, *Editorial: In Los Angeles, Political Meddling Poisons Redistricting* (Oct. 25, 2021) (“In a last-minute effort to save her district, Raman swapped out Suh for Jackie Goldberg, an L.A. school board member and former councilwoman who is the consummate political fighter. By then it was too late. The commission’s approved map hacked up CD 4 and CD 2, without even deciding which council person should represent each district.”).

¹⁰ See, e.g., LOS ANGELES TIMES, *L.A.’s Flawed Redistricting Process* (Feb. 17, 2012) (“But we use ‘politics’ to describe two different phenomena, one of them vital to the exercise of democracy, the other inherently corrupting. The commission redistricting process has demonstrated that it is subject to that second, corrosive form of politics. That sort of politics has less to do with adequate representation for a community of interest than it does with whether the process itself is being engineered to ensure that particular seats are crafted for particular candidates who are supported by particular incumbents. Raise this much campaign money for me, one incumbent may say to another, and ensure that your appointee votes for a final map that includes a particularly wealthy development in my district, and I’ll make sure that your protege has a district drawn that almost certainly will ensure her election next year.”).

¹¹ Charter Section 204 (b).

prohibition on “current city officer[s] or employee[s]” serving on the Advisory Commission,¹² City Council and other elected officials are free to appoint whomever they desire, regardless of their qualification or, more importantly, their putative disqualifications.¹³ This allows elected officials to appoint deeply political actors, consultants, lobbyists, and others that signal to the public that the Advisory Commission is not meant to hear public testimony in good faith, but is instead a battleground for political power grabs.

Perhaps most problematically, despite the prohibition on *current* elected officials, the law is silent on *former* elected officials serving on the Advisory Commission, providing a substantive loophole for City Council to exploit. City Council has appointed longtime former elected officials including a former City Attorney, former State Assemblyman, former California Senate Majority Leader, and former Deputy Mayor of Los Angeles for Economic Development.¹⁴

While some may argue that having former elected officials serve on the Advisory Commission is beneficial due to their experience, this practice endangers the Advisory Commission’s legitimacy, as it allows incumbents to lean on their political allies to promote their agenda and ensure reelection.¹⁵ Multiple studies have shown that elected bodies that delegate their drawing powers to politically appointed commissions get processes that are more partisan and political than truly independent commissions. Indeed, one study during the previous redistricting cycle even found that maps drawn by appointed commissions, like the Advisory Commission, resulted in a map with the “highest overall levels of partisan bias,” whereas an independent commission’s maps demonstrated “a near elimination of partisan bias.”¹⁶ Even more alarming, academic studies from around the country have found that political redistricting commissions are more likely to have a high partisan bias and are more likely to adopt a partisan

¹² Charter Section 204 (b).

¹³ While the City of Los Angeles Municipal Code is silent on the procedures and qualifications of appointment to the Advisory Commission, it *does* limit the amount of Commissioners who can serve on the Commission and the amount each elected office may appoint. *See* L.A., CAL. L.A. CHARTER § 204 (b)(2018).

¹⁴ *Commission Members - LACCRC 2021*, LOS ANGELES CITY COUNCIL REDISTRICTING COMMISSION (Oct. 25, 2021), <https://laccrc2021.org/commission-members/>.

¹⁵ *See, e.g.*, LOS ANGELES TIMES, *Editorial: For a better L.A. City Council, Make it Bigger* (Mar. 05, 2012) (“The Los Angeles City Redistricting Commission, composed of 21 political appointees, has proposed a map of 15 reshaped City Council districts, which probably do what a majority of the current council members, the mayor, the city attorney and the controller intended them to do: They secure districts and fundraising opportunities for favored incumbents; they punish members who act too independently; and they pave the way toward election for various aides and pols who are looking for a start in electoral politics.”); *See also* Noah Litton, *The Road to Better Redistricting*, OHIO STATE LAW JOURNAL 861 (2012).

¹⁶ *See, e.g.*, *The Effect of Redistricting Commissions on Electoral Competitiveness in the U.S. House Elections, 2002-2010*, JOURNAL OF POLITICS AND LAW 16 (2013) (independent commissions result in more competitive elections than partisan commissions); *See also* Barry Edwards *et al.*, *Institutional Control of Redistricting and the Geography of Representation*, UNIVERSITY OF CHICAGO JOURNAL OF POLITICS 724-25 (Apr. 2017) (independent commissions draw more compact districts than do state legislatures or partisan commissions); *See also* LOS ANGELES TIMES, *Editorial: For a better L.A. City Council, Make It Bigger* (Mar. 5, 2012) (“The Los Angeles City Redistricting Commission, composed of 21 political appointees, has proposed a map of 15 reshaped City Council districts, which probably do what a majority of the current council members, the mayor, the city attorney and the controller intended them to do: They secure districts and fundraising opportunities for favored incumbents; they punish members who act too independently; and they pave the way toward election for various aides and pols who are looking for a start in electoral politics.”).

map.¹⁷ Unfortunately, this is not new in Los Angeles, as the City Council has used every cycle since the Advisory Commission was established as a means of appointing loyalists that ultimately created highly political maps that put incumbents first and communities second.¹⁸

These political appointments have another, lesser-recognized downside. Because the public assumes every appointee is on the Advisory Commission to represent the political interests of the appointing official, these systems automatically and unfairly call into question the integrity and impartiality of even those Commissioners who wish to function in good faith.

III. City Council Ensures that the Commissioners are Responsive to their Appointing Authorities By Removing Commissioners Without Cause

Under the City's current system, each appointing authority (the Mayor of Los Angeles, City Controller, City Councilmembers, and City Attorney) has the power to not just appoint Commissioners but also to remove Commissioners without cause.¹⁹

Without a clearly defined removal process, the City Council, Mayor's Office, City Attorney, and the City Controller have removed their appointed officials on a whim. In doing so, the City Council has created a system in which they have total control over the decisions of their appointees. Disloyalty, or independence, results in consequences. Within the last six months, seven Commissioners have been replaced. Even more flagrant, six Commissioners were replaced within the last six weeks -- a climatic period in the redistricting process when decisions are being made and the entire exercise is most vulnerable to political influence.²⁰ During that period Commissioners for Council Districts four,²¹ six,²² seven,²³ nine,²⁴ and thirteen,²⁵ along with one

¹⁷ See, e.g., *The Effect of Redistricting Commissions on Electoral Competitiveness in the U.S. House Elections, 2002-2010*, JOURNAL OF POLITICS AND LAW 16 (2013) (independent commissions result in more competitive elections than partisan commissions); See also Barry Edwards et al., *Institutional Control of Redistricting and the Geography of Representation*, UNIVERSITY OF CHICAGO JOURNAL OF POLITICS 724-25 (Apr. 2017) (independent commissions draw more compact districts than do state legislatures or partisan commissions).

¹⁸ See, e.g., LOS ANGELES WEEKLY, *L.A. City Redistricting Land Grab* (Jan. 25, 2012) ("The roster for L.A.'s commission is an embarrassing who's-who of career City Hall puppets -- those guys and gals repeatedly stuck into commission/committee seats by elected officials who can count on them to stick to the script. To say the 2012 redistricting commissioners are cloaked in this culture of self-preservation and nepotism is an understatement; they are the fibers that give it form.").

¹⁹ Charter Section 204(b).

²⁰ See LACCRC Ex Parte Communications Log, LOS ANGELES CITY COUNCIL REDISTRICTING COMMISSION, City of Los Angeles, *Commission Ex Parte Log* (Oct. 25, 2021), <https://docs.google.com/spreadsheets/d/172QnTfqw100aVLh70Quak57PdXWz2S-x/edit#gid=2114953016>.

²¹ *Appointment of Jackie Goldberg to the Los Angeles City Council Redistricting Commission*, L.A. CITY CLERK (Oct. 25, 2021), https://clkrep.lacity.org/onlinedocs/2020/20-0668-S1_misc_10-13-2021.pdf.

²² *City of Los Angeles Redistricting Commission*, L.A. CITY CLERK (Oct. 25, 2021), https://clkrep.lacity.org/onlinedocs/2020/20-0668-S1_misc_09-27-21.pdf.

²³ *Appointment of Wendy Mitchell to the Los Angeles City Council Redistricting Commission*, L.A. CITY CLERK (Oct. 25, 2021), https://clkrep.lacity.org/onlinedocs/2020/20-0668-S1_misc_9-2-21.pdf.

²⁴ *Appointment of Susan Minato to the Los Angeles City Council Redistricting Commission*, L.A. CITY CLERK (Oct. 25, 2021), https://clkrep.lacity.org/onlinedocs/2020/20-0668-S1_misc_10-15-2021.pdf.

²⁵ *Appointment of Natalie Friedberg to the Los Angeles City Council Redistricting Commission*, L.A. CITY CLERK (Oct. 25, 2021), https://clkrep.lacity.org/onlinedocs/2020/20-0668-S1_misc_09-23-21.pdf.

of the Mayor's appointees²⁶ were all replaced without warning and seemingly without cause.²⁷ The timing for the removal and replacement of Commissioners was not innocuous as it often coincided with major mapping decisions made by the Advisory Commission that altered the political landscape for City Council.²⁸ The timing coupled with the removal of the Commissioners without cause suggests that Commissioners were removed by their appointing authorities because they were not vocal enough proxies for their appointing authorities. Regardless of intent, this stark and sudden removal of Commissioners signals to the public that their appointing authorities, namely the elected officials for whom they work for, were unsatisfied with their performance and needed to be removed.

Consequently, Los Angeles will have redistricting completed by a number of Commissioners who were not part of the Advisory Commission's long public input process and the credibility of our city's politics will decline further.

IV. City Council Has Had Extensive Closed-Door Conversations with Advisory Commission Members, Depriving the Advisory Commission of Any Independence

Throughout the 2020-21 redistricting cycle, City Council and other appointing authorities have maintained a tight grip on the Advisory Commission, more than likely providing direction to Commissioners throughout the process. Appointing authorities and their staff have been in constant contact with the Commissioners throughout the process. Nowhere else is this more evident than in the Advisory Commission's regular communications with their appointing authorities, their staff, and other elected officials as evidenced by this Advisory Commission *ex parte*²⁹ communications. Through October 1, this Advisory Commission has logged over 130 individual communications with elected officials on the subject of redistricting.³⁰

²⁶ *Council Redistricting Commission Appointment*, L.A. CITY CLERK (Oct. 25, 2021), https://clkrep.lacity.org/onlinedocs/2020/20-0668-S1_misc_9-7-21.pdf.

²⁷ A full accounting of the Commissioners, both past and present, for the Advisory Commission is available on the Los Angeles City Clerk's website. See LA City Clerk Connect Council File Management System, *LOS ANGELES CITY CLERK*, City of Los Angeles, (Oct. 25, 2021)

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=20-0668-S1>.

²⁸ See, e.g., LOS ANGELES TIMES, *Editorial: In Los Angeles Political Meddling Poisons Redistricting* (Oct. 25, 2021) ("In a last-minute effort to save her district, Raman swapped out Suh for Jackie Goldberg, an L.A. school board member and former councilwoman who is the consummate political fighter. By then it was too late. The commission's approved map hacked up CD 4 and CD 2, without even deciding which council person should represent each district.").

²⁹ Under Los Angeles Administrative Code section 2.22, Commissioners must, publicly and on the record, disclose any "communication between any member of the Los Angeles City Council Redistricting Commission and any elected City officer, or member of any elected City officer's staff, regarding a matter pending before the Commission." Any disclosures must include the time and date of the communication, the identity of the persons who participated in the communication, and a summary of the content of the communication.

³⁰ See LACCRC Ex Parte Communications Log, *LOS ANGELES CITY COUNCIL REDISTRICTING COMMISSION*, City of Los Angeles, *Commission Ex Parte Log* (Oct. 25, 2021), <https://docs.google.com/spreadsheets/d/172QnTfqw100aVLh70Quak57PdXWz2S-x/edit#gid=2114953016>.

Even more alarming, since the mapping process began several weeks ago, this Advisory Commission saw a significant increase in the elected officials' communications with their appointees.³¹ This increase in *ex parte* communications directly coincides with the start of one of the most precious and influential portions of redistricting: the map-drawing process. It also coincides with the removal of six Commissioners within six weeks. This type of undue political influence debases and undermines the supposed “independent”³² nature of the current Advisory Commission and further erodes trust in L.A. City government.

V. The City Council has Displayed a Blatant Disregard for Advisory Commission Process and Advisement

City Council has displayed a consistent and pervasive pattern of dismissal towards the Advisory Commission’s final recommendations,³³ and will continue to do so up to the end of the process. Despite the collection of over 12,000 public testimonials,³⁴ City Council has already stated explicitly that they will ignore the recommendation of the Advisory Commission and redraw the district boundaries to their liking under the guise of Commission dysfunction and ineptitude.³⁵ The City Council used a similar approach in 2010 when the City Council ignored the supposed independence of the Advisory Commission recommendations and instead

³¹ Despite public outcry, the Advisory Commission has failed to keep an accurate log of the Commissioners *ex parte* communications. As of October 25, 2021, the log is only complete through September 30, 2021. As a result, no “official” accounting of *ex parte* communications exists; however, conservative estimates place the number of communications between appointing authorities and their appointees closer to 200. See LACCRC Ex Parte Communications Log, LOS ANGELES CITY COUNCIL REDISTRICTING COMMISSION, City of Los Angeles, *Commission Ex Parte Log* (Oct. 25, 2021),

<https://docs.google.com/spreadsheets/d/172QnTfqw100aVLh70Quak57PdXWz2S-x/edit#gid=2114953016>.

³² See Los Angeles City Council Redistricting Commission (LACCRC) Flyer: What You Need to Know about Redistricting, LOS ANGELES CITY COUNCIL REDISTRICTING COMMISSION, City of Los Angeles, *What You Need to Know About Redistricting* (Oct. 25, 2021),

<https://laccrc2021.org/wp-content/uploads/2021/08/LACCRC-Fact-Sheet-3.pdf> (“The Mayor and City Council have appointed an *independent* citizen’s commission to advise them how to draw new districts that reflect the interests of the hundreds of communities in Los Angeles that make it unique.”)(emphasis added); See also Los Angeles City Council Redistricting Commission (LACCRC) Media Statement, LOS ANGELES CITY COUNCIL REDISTRICTING COMMISSION, City of Los Angeles (Oct. 25, 2021) (“[The Advisory Commission] conducted a process that secured the civic participation of over 12,000 Angelenos who submitted both spoken and written testimony, and for the first time in the City’s history drew the map boundaries in full view of the public – *not* in the back rooms of City Hall.”)(emphasis added).

³³ See LACCRC Ex Parte Communications Log, LOS ANGELES CITY COUNCIL REDISTRICTING COMMISSION, City of Los Angeles, *Commission Ex Parte Log* (Oct. 25, 2021),

<https://docs.google.com/spreadsheets/d/172QnTfqw100aVLh70Quak57PdXWz2S-x/edit#gid=2114953016>.

³⁴ See e.g., SPECTRUM NEWS 1, *Backlash Mounts Over Proposed West San Fernando Valley District* (Oct. 25, 2021) (“The idea of leaving over a quarter of a million people in a district that won’t have a chance to vote for over seven years, is outrageously anti-democratic,” said [City Councilman Paul] Krekorian, *who is prepared to throw out the map and start from scratch.*)(emphasis added).

³⁵ See, e.g., LOS ANGELES TIMES, *L.A. Council President Slams Redistricting Map, Saying it Has ‘Alienated Thousands’* (Oct. 22, 2012) (“[Los Angeles City Council President Nury Martinez] said in a statement the proposed changes to have ‘confused and alienated thousands’ – a message that increases the likelihood that council members will significantly rework the map.”).

gerrymandered district lines in “back-rooms” with donors, lobbyists, and elected officials.³⁶ Without taking a position on the appropriateness of the Advisory Commission’s recommended map, it is clear to California Common Cause that, for better or worse, the City Council plans to reject the Advisory Commission’s final recommendation, likely in its entirety.³⁷ Hundreds of hours of public participation and testimony will go for naught.

VI. To Ensure a Less Politicized Process, More Representative Districts, and Greater Responsiveness to Community Input an Independent Redistricting Commission Must be Created

Because the City Council and other elected officials have shown, cycle after cycle, that they are incapable of remaining neutral and allowing the Advisory Commission to redraw district boundaries absent political influence, California Common Cause strongly urges the Advisory Commission to include a recommendation that the City of Los Angeles establish a fully Independent Redistricting Commission, in its majority report, to redraw council district boundaries moving forward. In adopting this recommendation, the City of Los Angeles will join the Counties of Los Angeles and San Diego, the Cities of San Diego, Long Beach, Sacramento, Oakland, and many others, as well as the State of California, in establishing an independent redistricting process free of political influence and interference. This will allow subsequent Los Angeles redistricting commissions to conduct their duties without fear of political reproach and with independence and integrity. The perimeters of democracy should not be drawn by those in power but by the governed.

VII. Conclusion

We appreciate the work the Advisory Commission and its staff have done to facilitate a redistricting process that prioritizes community voices and inspires public participation. But the

³⁶ See, e.g., LOS ANGELES TIMES, *Editorial: L.A.'s Last Redistricting Was a Sham. City Leaders Have to do Better This Time* (Oct. 02, 2020) (“But in reality, the lines drawn were the result of backroom deals cut by certain council members — in particular, then-Council President Herb Wesson — and carried out by their appointees on the commission, evidently to protect and reward their allies and hurt their enemies.”); See also, LOS ANGELES TIMES, *In L.A., Redistricting Done Wrong* (Aug. 12, 2012) (“Line-drawing was the result of backroom deals, using private criteria, and Wesson and the other officials who drew the maps protected themselves from accountability for their decisions by cynically hiding behind their redistricting commission appointees.”).

³⁷ See, e.g., VALLEY STAR NEWS, *City Council Redistricting Leaves Valley College Unclear In Its Representative* (Oct. 24, 2012) (“What should have been an opportunity for public engagement has instead become a sad exercise in backroom deal-making,” said Krekorian. Both Krekorian and Raman were elected to their seats on the city council last year, the former reelected to serve his eleventh year in the position. If approved by the council, the map would place both of them in similar, but different districts than the ones that elected them. There is also a possibility they could be placed in completely different districts leaving constituents with new representatives to the body.”); See also SPECTRUM NEWS 1, *Backlash Mounts Over Proposed West San Fernando Valley District* (Oct. 25, 2021) (“The idea of leaving over a quarter of a million people in a district that won’t have a chance to vote for over seven years, is outrageously anti-democratic,” said [City Councilman Paul] Krekorian, *who is prepared to throw out the map and start from scratch.*”(emphasis added).

structure of, and lack of ethical guardrails around, the Advisory Commission has resulted in a system ripe for corruption — and L.A.'s elected officials have corrupted it. They have manipulated our redistricting process and minimized the public interest to solidify their power over city politics. We ask the Advisory Commission to recommend in its final majority report that the City of Los Angeles move to an Independent Redistricting Process in 2030 and beyond.

Respectfully Submitted,



Handwritten signature of José Del Río III in black ink, featuring a large, stylized initial 'JDR'.

José Del Río III

Local Redistricting Advocate
California Common Cause