

September 7, 2021

Dear Members of the Rhode Island Special Commission on Reapportionment:

Congratulations on your appointment to the Special Commission on Reapportionment. The work you are undertaking is important and we wish you well as you begin.

We write today with suggestions for how you can make the redistricting process more accessible, transparent, and fair. Our organizations, representing thousands of Rhode Islanders, including a broad cross section of the state, believe that you should give serious consideration to the following ideas.

An accessible process is one that provides ample opportunity for all Rhode Islanders to offer their views about how their communities are represented. Making this process more accessible may take extra work, but the reward will be maps that genuinely reflect the will of the governed. We ask that you hold your meetings throughout the state and ensure that they are held at a variety of times of day and days of the week. Any in-person meetings should occur at locations that are both accessible by public transportation and in buildings that are accessible to people with mobility disabilities. Given the advances in technology made during the pandemic, and Covid's persistence in the community, we also believe that any in-person meetings should allow for the public to participate online as well and should be simultaneously broadcast, with recordings of the meetings archived online within 24 hours.

The recently released census results confirm that the state's Latino population continues to grow at a rapid pace. Acknowledging the importance of that population to the state, we ask that the Commission provide Spanish interpretation of its meetings, and provide Spanish-language translations of its documents.

Public interest in redistricting has increased in the last decade. Advances in technology mean that it is possible for any Rhode Islander to draw maps at the census block level. We ask that you allow the public to submit their own maps using any publicly available software platform. When the Commission releases maps we ask that you also release the shapefiles for those maps, as well as any dataset used to draw them.

The public needs time to evaluate any maps the Commission releases. That is why maps should be available for at least 48 hours before public comment is allowed, and no votes should be taken until at least 48 hours have passed since public comment.

The process will be transparent if your work deliberations and decisions are made during your public meetings, not behind closed doors.

The most important step the Commission can take to make your work more transparent is to adopt a written set of standards to guide you in the map-making process. That means stating and ranking the criteria you will use to draw maps. The public will benefit from your deliberation

about what values you prioritize in the process. The enabling statute that created the Commission contains a number of criteria and we urge you to consider the meaning of each.

Whenever the Commission releases maps they should be accompanied by a written statement explaining how the maps reflect those criteria. That gives the public insight into the Commission's rationale for the many decisions that go into a set of maps.

Rhode Island has an unusually large percentage of split census blocks.<sup>1</sup> If you choose to continue that practice, we ask that you explain your rationale.

We recognize that it is not the Commissioners themselves, but rather the consultant that has been hired by the Joint Committee on Legislative Services, that draws the actual maps. The consultant should be answering to you, the Commission that the General Assembly has delegated to perform this task, and no one else. That is why we ask that you make public immediately any correspondence members of the Commission receive outside of testimony taken at Commission meetings, and disclose any communications the consultant receives that are not from the Commission.

Finally, we write to emphasize that any maps you draw should be fair maps. That means they should serve the public interest, and not the narrow interests of incumbent politicians. The best way to draw fair maps is to center communities of interest in the Commission's work. Such communities of interest might include those with racial, ethnic, economic, cultural, geographic, or historical identities. The Commission should, as part of its process for establishing written standards, create your own definition of communities of interest.

Another step the Commission can take to draw fair maps is to end the practice of prison-based gerrymandering. If you leave those who were counted at the Adult Correctional Institution during the census in Cranston-based districts you will artificially enhance the voting power of the other residents of those districts. Eleven states, including neighboring Connecticut, have ended the practice of counting incarcerated people in the community where they are incarcerated, instead of their home communities. Just last week the redistricting commission in Pennsylvania voted to end prison gerrymandering. Rhode Island law clearly states that a person's residence for purposes of voting does not change because of their incarceration.<sup>2</sup>

By making the process accessible and transparent you will allow the residents of Rhode Island to help you identify those communities and will help you draw maps that better represent the diversity of our state.

Sincerely,

(Organization names in alphabetical order)

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<sup>1</sup> Amos, Brian, Michael P. McDonald, Russell Watkins. 2017. When Boundaries Collide: Constructing a National Database of Demographic and Voting Statistics. *Public Opinion Quarterly*.

<sup>2</sup> R.I. Gen. Laws § 17-1-3.1

ACLU of Rhode Island  
Alliance of Rhode Island Southeast Asians for Education (ARISE)  
Brown Votes  
Clean Water Action Rhode Island  
Common Cause Rhode Island  
Disability Rights Rhode Island  
Every Vote Counts Brown  
Formerly Incarcerated Union of Rhode Island  
Latino Policy Institute at Roger Williams University  
League of Women Voters of Rhode Island  
NAACP Providence Branch  
Planned Parenthood of Southern New England  
Rhode Island Coalition Against Domestic Violence  
Rhode Island Coalition Against Gun Violence  
Rhode Island Coalition to End Homelessness  
Rhode Island Democratic Women's Caucus  
Rhode Island Developmental Disabilities Council  
Rhode Island Commission for Human Rights  
Rhode Island Latino PAC  
Rhode Island Working Families Party  
United Auto Workers Region 9A  
Women's Fund of Rhode Island  
The Womxn Project