

June 22, 2021

*Sent Via Email*

Orange County Board of Supervisors  
Hall of Administration, Board Hearing Room  
333 W. Santa Ana Blvd.  
Santa Ana, CA 92701  
[response@ocgov.com](mailto:response@ocgov.com)

**Re: Public Comment on the Supervisorial Redistricting Process for the June 22, 2021 Meeting**

Dear Members of the Board of Supervisors:

The People's Redistricting Alliance (PRA) writes to thank you for your work to prepare for the upcoming redistricting process and for agendaizing redistricting during your June 22 meeting. We are pleased that steps have been taken to clarify the Board's process for redrawing its legislative districts, including a plan for public hearings and workshops and timeline under which that process will take place, and that your redistricting website is online and includes translation into languages required under state law. We write to express some remaining concerns.

**I. Time for Public Input**

To ensure Orange County residents have a real voice in the Board's redistricting process, they must be given enough time to participate. This is especially true after it releases draft maps. The Board's updated redistricting plan only gives the public a week to review draft maps before providing comment and an additional week for the Board to finalize a plan. This time is insufficient for meaningful engagement. To ensure more robust and informed public input and give the Board the time necessary to thoughtfully consider and integrate feedback, we ask that the Board increase the amount of time it has to engage the public regarding its draft maps. The Board can do this by (1) having staff start drafting a map adoption ordinance now which would attach the final map as an exhibit and (2) selecting a final map during a hearing in December, not on November 16, by attaching the map to the ordinance. This would result in two to three additional weeks to hear from the public. Furthermore, should the California Citizens Redistricting Commission extend its deadline to finalize maps into January of next year, we ask that the Board do the same, aligning its deadline with that of the statewide commission.

**II. Opportunities for Public Input**

We believe that redistricting should be about people, not partisan politics. That means the Board should take every opportunity to hear from the public and draw maps that grow rather than limit community voices in county government. We thank the Board for considering seven community hearings and workshops before the release of draft maps, but these opportunities are only meaningful if communities of interest (COI) testimony are collected during each. We ask that the Board allow for public input regarding COI at every pre-draft map hearing and workshop. We are also concerned that the Board's updated redistricting plan includes limited opportunities for public input after the release of draft maps. We encourage you to increase the number of post-draft map public hearings and ask that you consider extending your deadline to finalize maps into January of next year if the statewide commission decides to do so as a way of achieving that goal. We also appreciate that the Board has

stated an intention to schedule district-specific workshops in the evenings, presumably to increase attendance. To further maximize opportunities to hear from communities, we ask that some hearings and workshops be scheduled at different times, with some over the weekend. Given ongoing concerns regarding the COVID-19 virus, we also ask that all hearings and workshops have opportunities for remote participation. Steps such as these will ensure the volume, quality, and diversity of public input necessary to draw fair maps.

### **III. Language access**

Roughly one in three Orange County residents are immigrants, many of whom face language barriers that prevent them from meaningfully engaging in public dialogue when conducted only in English. As you know, state law now requires counties and cities to provide language interpretation as part of local redistricting hearings and workshops. In Orange County, that requirement includes Spanish, Vietnamese, Korean, and Chinese. We are pleased that the Board's redistricting website is translated into these languages and ask that you integrate them into every aspect of your public engagement. We also ask that you extend your language assistance where possible to include other languages. For example, according to the U.S. Census Bureau, there are nearly 53,000 Tagalog and 32,000 Persian speakers living in Orange County. Providing written translation and live interpretation in these and additional languages will be critical to involving all immigrant communities in this once-a-decade process.

### **IV. Website**

We wanted to commend the Board for establishing its redistricting website. It will serve as an important hub for information about the redistricting process and will be critical to educating the public, keeping them informed about hearing and workshop schedules, and providing access to official data and draft maps. We appreciate the inclusion of information on opportunities to testify and the process for doing so, but the information is both incomplete and inconspicuous at the bottom of your website. To make it easier for the public to access, we ask you to move information on when and how to testify to a more visible part of the page. This section should note (1) that live interpretation in covered languages will be available upon timely request, (2) that public comment and draft maps can be submitted in person or by email, including the email address and any deadline for submitting email comment (e.g., by 2 PM the day of the hearing), (3) whether the public must provide live public comment in person or if live comment by telephone and/or videoconference is possible, (4) that redistricting hearing times are fixed to encourage more participation, (5) the amount of time each member of the public will have to provide comment (e.g., 3 minutes), and (6) any other procedures the public will need to follow, such as filling out a comment card. Highlighting opportunities to provide public input and how to do so will help get more Orange County residents involved in this process.

Please do not hesitate to contact us for any clarification or with any questions regarding these recommendations. We can be reached through the Orange County Civic Engagement Table (OCCET) at [redistricting@occivic.org](mailto:redistricting@occivic.org).

We look forward to working with you to make this a fair, open, and transparent process.

Sincerely,

The People's Redistricting Alliance

ACLU of Southern California  
AHRI Center  
California Healthy Nail Salon Collaborative  
Coalition for Humane Immigrant Rights  
Council on American-Islamic Relations  
Latino Health Access  
Orange County Asian and Pacific Islander Community Alliance  
Orange County Civic Engagement Table  
Orange County Congregation Community Organization  
Orange County Communities Organized for Responsible Development  
Orange County Environmental Justice  
Orange County Voter Information Project  
Pacific Islander Health Partnership  
Resilience Orange County  
South Asian Network  
VietRISE