



March 15, 2021

VIA E-MAIL

San Francisco Elections Commission
1 Dr. Carlton B. Goodlett Place
City Hall, Room 48
San Francisco, CA 94102

The Honorable San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102

John Arntz, Director
San Francisco Department of Elections
1 Dr. Carlton B. Goodlett Place
City Hall, Room 48
San Francisco, CA 94102

The Honorable London Breed
Mayor of San Francisco
1 Dr. Carlton B. Goodlett Place
City Hall, Room 200
San Francisco, CA 94102

Dennis J. Herrera, City Attorney
Office of the City Attorney
City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

RE: Recommendations for City and County of San Francisco local redistricting efforts

Dear Commissioners, Director Arntz, Mr. Herrera, Supervisors, and Mayor Breed,

We appreciate the efforts of the San Francisco Elections Commission, Department of Elections, Office of the City Attorney, Board of Supervisors, and Mayor's Office to address the upcoming, once-in-a-decade, local redistricting effort.

On Feb. 12, 2021, [the U.S. Census Bureau announced](#) it would deliver the [Public Law 94-171 redistricting data](#) to all states by Sept. 30, 2021. This is a significant delay. The original, statutory deadline was March 31, 2021.

With this six-month delay of redistricting data from the U.S. Census Bureau, the League of Women Voters of San Francisco is concerned that local redistricting efforts in the City and County of San Francisco will face a compressed timeline if adjustments are not made. Our

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League of Women Voters of San Francisco

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concerns relate to the selection and appointment process for members of the San Francisco Redistricting Task Force, and also to the amount of time the Redistricting Task Force needs to adequately discharge its duties in the service of the public good.

The League of Women Voters of San Francisco believes responsibility for redistricting preferably should be vested in an independent commission with diverse membership that is representative of the public at large and protective of minority group interests. And we believe that every redistricting process should include:

- Specific timelines for the steps leading to a redistricting plan.
- Full disclosure throughout the process and during public hearings on the proposed redistricting plan. The open, unbiased process should have public participation and access at all levels and steps, and be subject to open meeting laws.

A fair, representative, and inclusive democracy depends upon informed and active public participation at all levels of government. Local redistricting in San Francisco should include opportunities for robust public participation.

Therefore, the League of Women Voters of San Francisco has drafted this set of recommendations for ensuring a fair, equitable, transparent, and accessible local redistricting process.

Our Recommendations

- 1. Convene the Redistricting Task Force as soon as possible to allow for a fair, equitable, transparent, and accessible redistricting process.**
 - a. San Francisco's local redistricting process and the important work of the Redistricting Task Force should not be compromised by the delay in Census redistricting data. Adjustments should be made to ensure there is adequate time for all steps in the process, including member applications and selection, community outreach and education, and public input and feedback.
- 2. Publish specific timelines for the steps in San Francisco's redistricting process in a timely, public, and conspicuous manner, and provide for public comment.**
 - a. Post timelines on the sfgov.org website.
 - b. Share and discuss the specific timelines during remote, public-accessible meetings (by web and phone, and when it becomes safe, in-person) of the Elections Commission, Board of Supervisors, and Redistricting Task Force.
 - c. Make timelines for all steps of the process accessible to members of the public who are disabled or lack reliable access to the internet.

- 3. Establish minimum standard qualifications for Redistricting Task Force members appointed by either the Elections Commission, Board of Supervisors, or Mayor.**
 - a. Is a resident of the City and County of San Francisco.
 - b. Represents San Francisco's diverse population.
 - c. Has not been a candidate for political office or paid by a political campaign in the last 5 years.
 - d. Has general knowledge and appreciation for the diverse demographics, neighborhoods, and geography of San Francisco.
 - e. Has a flexible schedule for attending meetings.
 - f. Has no conflict of interest prohibited under the conduct and conflict laws applicable to other city officers.
 - g. Is not currently a direct hire employee of an elected official in San Francisco.
 - h. Possesses experience that demonstrates analytical skills relevant to the redistricting process and voting rights, and possess an ability to comprehend and apply the applicable state and federal legal requirements.
 - i. Possesses experience that demonstrates an ability to be impartial.
- 4. Create an accessible and equitable Redistricting Task Force application process to support the appointment of a diverse and inclusive membership.**
 - a. The membership of the Redistricting Task Force should reflect the diversity of the San Francisco community, that is representative of the public at large and protective of minority group interests.
 - b. All San Francisco residents should have equal access to online government services and information. Information about the Redistricting Task Force application timeline, selection process, the application itself, and all related documents and forms should be available online and also physically available. All related websites and online materials should be accessible. Local governments are required to comply with [Americans with Disabilities Act \(ADA\) Title II](#) and [Section 508 of the Rehabilitation Act](#). Federal courts have referred to [WCAG 2.1 AA](#) as the accessibility standard.
 - c. Allocate appropriate administrative support to share information about the application timeline, selection process, the application itself, and supporting materials to the city's various communities of interest, taking into account reaching a diversity of race, ethnicity, culture, language, age, gender, sexual orientation, socioeconomic status, and other factors.
- 5. Provide ample time for public comment, questions, and input throughout the redistricting process.**
 - a. Publicly publish and allow for public comment on any Request for Information (RFI) or Request for Proposal (RFP), and related documents

- concerning vendor, contractor, or consulting services in support of the Redistricting Task Force.
- b. Allow for adequate time and support for public comment, including solicitation of members of the public to suggest their own district maps, both online (web and email) and also physically (by mail, drop-off, and when it becomes safe, at in-person public events).
 - c. Allocate appropriate administrative support for the Redistricting Task Force to provide for the appropriate accommodations for the public to participate at all steps of the redistricting process. Provide transparency about activities, decisions, public comment opportunities, and input periods.

Summary

The League of Women Voters of San Francisco is committed to supporting a more fair, equitable, transparent, and accessible local redistricting process. We strongly encourage the San Francisco Elections Commission, Department of Elections, Office of the City Attorney, Board of Supervisors, and Mayor's Office to make every effort to create a transparent process to enable maximum public participation in the most diverse, inclusive, and equitable manner possible. We want to be part of helping create long-term solutions for the government to remain effective in conducting the people's business in full public view, no matter the circumstances.

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 look forward to working with you and engaging in a discussion about our recommendations.

Sincerely,



Alison Goh
President
League of Women Voters of San Francisco
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CC: Commissioner Lucy Bernholz, President, San Francisco Elections Commission
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Commissioner Viva Mogi, San Francisco Elections Commission
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The Honorable Supervisor Shamann Walton, President, Board of Supervisors
The Honorable Supervisor Connie Chan, District 1
The Honorable Supervisor Catherine Stefani, District 2
The Honorable Supervisor Aaron Peskin, District 3
The Honorable Supervisor Gordon Mar, District 4
The Honorable Supervisor Dean Preston, District 5
The Honorable Supervisor Matt Haney, District 6
The Honorable Supervisor Myrna Melgar, District 7
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