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November 15, 2021

City of San Diego Independent Redistricting Commission Redistricting2020@sandiego.gov; LJFleming@sandiego.gov;
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202 C Street, San Diego, California 92101

Subject: Geographical and Infrastructure features to pick non Gerrymandering Boundaries for Council Districts

Dear Honorable Redistricting Commissioners,

Congratulations on selecting a Preliminary MAP/PLAN based on Clairemont United 'Compromise' Map Link to map: <https://portal.sandiego-mapping.org/submission/p6340> <https://districtr.org/plan/74956> . When the Commissioners made the motion and adopted this Clairemont United 'Compromise' Map (hereafter 'Compromise' Map) the Commission recognized that future amendments were necessary. The level of Commission consensus for the 'Compromise' Map' was insufficient to unanimously approve that map. The discussion concerning this 'Compromise' Map recognized that future amendments will be necessary. Particularly, Commissioners acknowledged that the 'Compromise' Map's racial, ethnic and language concentrations, for District 9, diluted it from the already existing 2011 District Nine (D9).

Concerns regarding the dilution of District Nine (D9) were raised by the Commission's Special Counsel in his MEMORANDUM entitled: Preliminary Analysis of Draft Council District Maps, of November 12, 2021. Quoting: *"However, every draft map can be improved, and these maps are no different. Commissioners and the public should regard the Commission's designation and filing of one draft map as the beginning, not the end, of a process that will yield effective and legally compliant final district maps. In particular, I respectfully direct Commissioners' attention to addressing areas where it appears that minority voters' opportunity to elect the candidates of their choice may be reduced somewhat because of population shifts. The example of where this may be occurring in the draft maps is the reduction of Latino CVAP in proposed District 9 as compared to the existing District condition, on all three maps."* (Memorandum Preliminary Analysis of Draft Council District Maps, November 12, 2021, Page 4).

In that same MEMORANDUM, your Counsel defined more exactly the shorthand of 'natural boundaries' to be used to avoid the appearance of Gerrymandering. Quoting: *"I suggest that Commissioners focus some attention on whether the proposed maps are all geographically compact and contiguous. The work that has been done, I am informed, to better align district boundaries with significant geographic or public infrastructure features is a helpful step in better protecting communities of interest."* (Ibid, Page 2).

As your Commission considers adjustments to the adopted Preliminary Map/Plan , 'Compromise' Map, I want to suggest that the Commission address the dilution of District Nine (D9) by adjusting from the undiluted 2011 D9 Map and correct the violation of "natural boundaries" presented in both the adopted 'Compromise' Map and the rejected Chairman's Map. Specifically, these maps add to District Nine (D9) and District Three (D3) territories which are outside of the existing 2011 Districts, their traditional settlement boundaries, and cross over the entire San Diego River geographical feature and the very significant infrastructure features between Friars Road and Camino Del Rio South – including the entire Kumeyaay I-8 Freeway. Most of District 9 (D9) and District Three (D3) are in an entirely different watersheds; but this new map reaches into the San Diego River water shed to capture speculative development interests and populations.

I request and recommend that the Commission proceed by removing from the Preliminary Map:

1. Remove, from the Mid-City areas, the entire San Diego River geographical feature and the very significant infrastructure features between Friars Road and Camino Del Rio South – including the entire Kumeyaay I-8 Freeway;
2. Return, as a jumping off place to the 2011 District base map for D3, D4, and D9; and
3. Then adjust populations by carefully using limited Block Groups rather than whole areas to promote community sharing and recognize that several neighborhoods are in transition and that their names are mere artifacts of non-historic development or violate racial, ethnic, and concentrations of language minority voting rights principals of

redistricting. It is also necessary to acknowledge that some “neighborhood” designations may have been made to foster illegal racial, ethnic, and language minority groups.

Making these initial jumping off adjustments will address non-dilution objections, conform better to the gerrymandering prevention principal of natural boundaries, and address some of the very disturbing racial discrimination testimony to reinstitute the “COLOR LINE” boundary of the 94 Freeway with Blacks, Asians, and Hispanics being kept South of that Freeway 94 “COLOR LINE”. [Please See my letter: Serious Racial Color Line Comments during Rolando Park, Redwood Village & Rolando Village Testimony on Chairman’s Compromise Dilution Maps of November 12, 2021, incorporated by reference]

Adjustments that the Commission could consider would be to assign Kensington and surrounding neighborhoods to the Mission Valley San Diego River watershed as suggested by the Chairman’s map. All of the areas, North of El Cajon Boulevard, are in the San Diego River watershed. Areas South of El Cajon Boulevard are in the Chollas Creek watershed. This North / South split would also be consistent with the distribution of racial, ethnic, and language minorities. If these switches were made then D4 should be expanded North towards San Diego State University, along University Avenue & El Cajon Boulevard, where there is a large African American Black population of language minorities residents; as illustrated by their IFTIN School, the Voice and Viewpoint newspaper offices, and the Offices of the African Alliance services organization. Again, actual Block groups must be carefully considered for D4 connection.

Prior to the 2011 redistricting many of the areas South of the San Diego Mission Valley area were in District Seven (D7). Reassignment of Kensington and some of the College neighborhoods back to District Seven might please those neighborhoods and not dilute D3, D4, and D9 where there are significant racial, ethnic, and language minority populations. Extension of D4 North along the City’s eastern Boundary would link a significant emerging Black community. A careful study of the residences of SDSU Black and Latin students would treat these students like UCSD.

If populations, to rebalance D4 and D9, are needed; then I suggest that areas of natural boundaries be looked to along the Chollas Creek watershed – on the West side of the Archie Moore 15 Freeway. Boundary Street is the original boundary of the City of San Diego and is the Western boundary of the Chollas Creek watershed. D3, D4, D8 & D9 all shop and do business along Market Street. Some limited population contribution can be made from District Three (D3) and District Eight (D8) on a block group level. Adding Latino Spanish speakers from these districts to the Latino Spanish speaking District Nine should meet voting rights conditions.

The Commission must realize that Planning Committee Areas and neighborhood planning groups are often not based on a scientific or consistent set of factors. Some these areas are based on an actual subdivision map or an actual single annexation to the City of San Diego; but many of them were somewhat irrationally designated during a time period when the City had five or eight Council Districts. I know the history of these South of Mission Valley/ SD River planning groups and they were often designated to encompass very large areas and populations that remained after small subdivisions were annexed into our City. Some neighborhoods were formed to purposely discriminate!

The Compromise map, after refinement and fine tuning must “... *ensure fair and equitable redistricting for all racial, ethnic and language minorities, and be in conformance with the requirements of the U.S. Constitution and federal statutes as amended and the San Diego Charter.*” (**BYLAWS & OPERATING PROCEDURES of the CITY OF SAN DIEGO 2020 REDISTRICTING COMMISSION, ARTICLE I – Name and Purpose, Section 3.**)

Please publish all of the Article III documents, all of my correspondence directed to the Commission, and this letter as part of the Commission’s record. Publics’ confidence is dependent on conformance to the Bylaws rules, full transparency, and the law concerning voting rights.

All the best, John Stump 619 281 4663
Copy: San Diego City Attorney Mara Elliot and San Diego City Clerk