

December 15, 2021

Honorable Chair Hebrank and Commissioners

Subject: Comments on the 2021 Final Plan from the 2020 REDISTRICTING COMMISSION OF THE CITY OF SAN DIEGO

The comments provided below are on the general sections of the 2021 Final Plan and the sections addressing Districts 1, 2, 5 and 6.

All of the districts have the same closing statement:

*The district is geographically compact to the extent possible while balancing other criteria and communities of interest boundaries. The district does not bypass population unless required to unite communities of interest or otherwise achieve other criteria.*

While this is the same statement made in the 2011 Final Redistricting Plan and may have been true at that time, it is not true for this plan. The statement should be revised for Districts 1, 5, and 6 to state:

*The district is geographically compact to the extent possible given the constraint to balance the citywide populations. The district does bypass population and splits communities of interest in order to meet the population and demographic mandates of the Commission.*

For example the proposed Final Map stretches District 1 to take all of the Pacific Beach neighborhood area and splits the campus of UCSD, bypassing that population and that of a portion of the surrounding neighborhood of La Jolla from District 1 rather than splitting the Pacific Beach neighborhood.

**Page 2**, Paragraph 2: Add a bullet point for the requirement that District 6 must have a minimum Asian population of 40%. This was the only redistricting goal which was used to achieve the economic gerrymandering of District 1.

**Page 5**, under the Neighborhoods heading: La Jolla should be changed to La Jolla (partial – excludes portion bounded by Genessee, La Jolla Village Drive and I-5 – see Attachment 1). This change should also be made on the list of neighborhoods found on **Page 22**.

**Page 5**, under Findings and Reasons for Adoption, the fourth bullet: The first sentence should be changed to read:

*The Commission decided to split UCSD into Districts 1 and 6.*

**Page 6**, under Findings and Reasons for Adoption, first bullet point: Pacific Beach and La Jolla are very different communities and the only reason they were put together was to meet population requirements; if Pacific Beach remained in District 2, the population was excessive.

**Page 6**, under Findings and Reasons for Adoption, second bullet point: The 92130 zip code area of Torrey Highlands is put in D1 to balance D5's population. The community is in a different planning group, a different neighborhood and different school district from Carmel Valley. There was no testimony to support the statement that their community has shared interests with Carmel Valley, other than they had the same zip code.

**Page 6**, District 2, under the Community Planning Areas heading, change Mission Bay Park to Mission Bay Park (partial – area not included in District 1). This should also be included in the table on **Page 22**.

**Page 6**, District 2, under the Neighborhoods heading, change Mission Bay to Mission Bay (partial – area not included in District 1). This should also be included in the table on **Page 22**.

**Page 13**, District 6, under the Neighborhoods heading: include bullet point for La Jolla (partial – portion bounded by I-5, Genessee Avenue and La Jolla Village Drive). This should also be included in the table on **Page 25**.

**Page 13**, District 6, under the Contiguity heading: “Entirely” should be stricken from the comment that “Rancho Encantada is not *entirely* contiguous” with the rest of D6. It is not contiguous. There are ways to achieve a D6 with an Asian population of over 40% without introducing this non contiguous community.

This section attributes the evaluation to the Consultant. This is troubling. The Commission should be evaluating the information provided by the Consultant. If the Consultant is referenced, there should be documentation provided, identifying the Consultant and the Consultant’s qualifications to make determinations for the Commission.

**Page 14**, District 6, under the Findings and Reasons for Adoption heading, second bullet: The section of University City north of La Jolla Village Drive is not needed to assure a District 6 Asian population of over 40%. The Asian population of this section of University City is 35.7% and arguably dilutes the Asian population percentage of D6. There are other areas which would help better meet the stated goal of an Asian population over 40%, as shown in Attachment 2. Namely, Miramar Ranch North which is in SDUSD, unlike Rancho Encantada which is in Poway Unified School District and has a lower Asian population than Miramar Ranch North. See the December 9, 2021 email submission which showed a possibility with a 41.4% population and an AVAP of 40.9%. (Map <https://districtr.org/plan/91467>.)

Also in this section there is no finding given for including Rancho Encantada in D6. It is not contiguous with the rest of D6 and is in the Poway Unified School District which means its COI are more closely aligned with the communities of D5.

**Page 22**, Summary for District 1 needs to include La Jolla (partial – excludes portion bounded by Genessee, La Jolla Village Drive and I-5) under Neighborhoods.

**Page 22**, Summary for Districts 1 and 2 needs to include Mission Bay (partial-as appropriate) under Neighborhoods. Also make Mission Bay Park partial under District 2 Community Planning Areas.

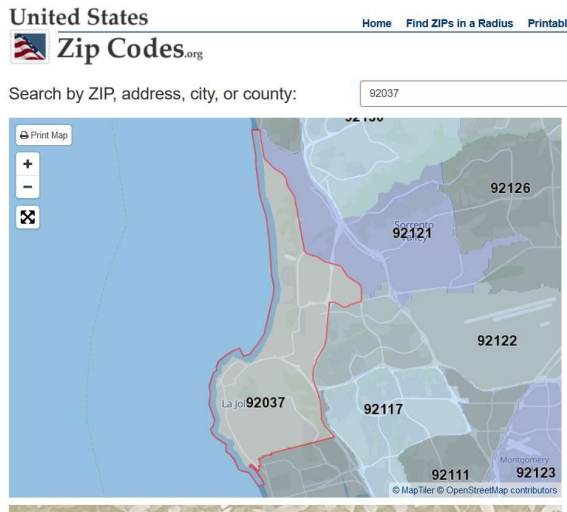
**Page 25**, Summary for District 6 needs to include La Jolla (partial – includes portion bounded by Genessee, La Jolla Village Drive and I-5) under Neighborhoods.

Submitted by,

Sherri S. Lightner

## ATTACHMENT 1

La Jolla zip codes are given by the US Postal Service as: 92037, 92038, 92039, 92093, & 92093. These zip codes include the entire UCSD campus, La Jolla including the area between Gilman Drive and I-5 and the area bounded by Genessee Avenue, La Jolla Village Drive, and I-5. It includes the area where Scripps Green Hospital, Torrey Pines Lodge and the golf course are located as shown in the attached figure. The businesses in the area east of I-5 bounded by Genessee and La Jolla Village Drive have addresses in La Jolla, CA 92037 and include the La Jolla Marriott, the Jewish Community Center, La Jolla Country Day School, etc.



## ATTACHMENT 2

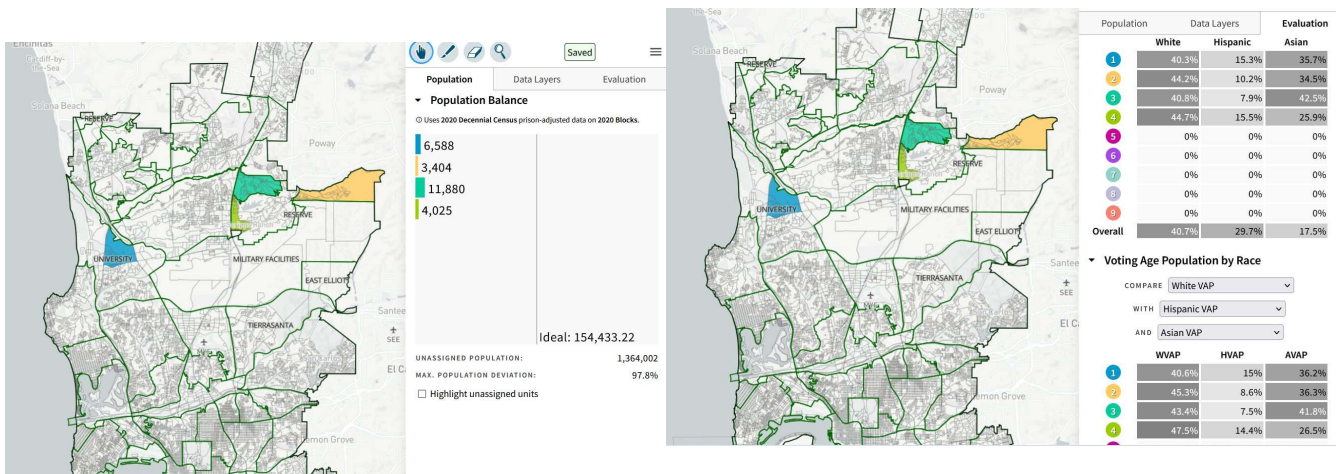
The Districtr mapping tool was used to compare the Asian population contributions of possible D6 additions. Anything under 40% acts to dilute the Asian population of D6. Three of the areas considered will dilute the Asian population of D6. They are University City north of La Jolla Village Drive, Rancho Encantada and the portion of Scripps Ranch which was split off from D5 in the Final Map. A different D5/D6 interface could produce a Map with a contiguous D6, a higher AVAP and the possibility of D5 retaining all of Torrey Highlands.

Blue is University City north of La Jolla Village Drive: Pop: 6,588; 35.7% Asian; AVAP 36.2%

Yellow is Rancho Encantada: Pop: 3,404; 34.5% Asian; AVAP 36.3%

Turquoise is Miramar Ranch North: Pop:11,880; 42.5% Asian; AVAP 41.8%

Lime is section of Scripps Ranch from Final Map: Pop: 4,025, 25.9% Asian; AVAP 26.5%



Ref: <https://districtr.org/plan/93508>