



SANGER SWYSEN & DUNKLE

Attorneys at Law

March 22, 2022

Robert M. Sanger
rsanger@sangerswysen.com
Certified Criminal Law Specialist*

Catherine J. Swysen
cswysen@sangerswysen.com

Stephen K. Dunkle
sdunkle@sangerswysen.com
Certified Appellate Law Specialist*

Miguel A. Avila
mavila@sangerswysen.com

Sarah S. Sanger
ssanger@sangerswysen.com

Hon. Frank J. Ochoa (Ret.)
fochoa@sangerswysen.com
Of Counsel

Rebekah K. Dillon
rdillon@sangerswysen.com
Licensed Private Investigator
PI #29006

**Certified by the State Bar
of California Board of
Legal Specialization*

Independent Redistricting Commission
City of Santa Barbara
c/o Ariel Calonne, City Attorney

Re: District Elections Committee "Community of Interest" Plan

Honorable Commission Members:

Attached you will find the District Elections Committee "Community of Interest" Plan which is a variant based upon public input of our earlier maps, DEC EU and DEC EUB. The DEC Community of Interest Plan would include the area between Highway 101 and Castillo Street from Victoria Street to Ortega Street in order to include the Westside Neighborhood Center in District 3. It would also include Harding Elementary School and La Cumbre Junior High School in District 3. District 1 would be drawn close to its existing boundaries.

Each of the District Elections Committee maps would be appropriate for Santa Barbara City Council districts for the next decade. Each map meets the requirements of the Banales judgment and orders, given the current demography of the City of Santa Barbara, and meet other districting criteria at the federal and state levels. Under all present circumstances, the District Elections Committee's preferred map is the DEC Community of Interest Plan.

With respect to the Banales judgment, it puts forward the "intent" of the parties that two Latino Citizen Voting Age Population (CVAP) districts be created. Unfortunately, as a result of population changes in the City of Santa Barbara and the likely undercount of city residents, it is not possible to create a majority Latino CVAP district on Santa Barbara's westside (District 3) at this time. It is, however, possible to create a majority Latino CVAP district on Santa Barbara's eastside (District 1) and a majority minority CVAP district in District 3. All of the District Elections Committee plans result in a majority Latino CVAP district in District 1 and a majority minority CVAP district in District 3.



During the redistricting process, the District Elections Committee and community have put forward many proposals that have been incorporated in these maps. All districts are contiguous, respect the integrity of local neighborhoods and communities of interest, are easily identifiable, and are compact. Further, all districts are within 10% of one another in total population, adhere to the Federal Voting Rights Act and the California Voting Rights Act, and do not engage in racial gerrymandering. In addition, these plans minimize the shifting of voters between districts, take into account future population growth, and preserve the core of existing districts. Finally, no partisan considerations have gone into the drawing of these maps.

Thank you for your consideration. We encourage the Independent Redistricting Commission to select one of the District Elections Committee plans.

Very truly yours,

Hon. Frank J. Ochoa (Ret.)

CC: Mayor and Members of City Council