

St. Louis Citizens for Fair Maps

Nov. 30, 2021

President Reed and members of the St. Louis Board of Aldermen:

The undersigned organizations write to uplift concerns raised by community members regarding the St. Louis City Redistricting process and request further opportunity for accessible and meaningful community involvement in advance of the Board's final vote, as well as clarification of specific questions and concerns regarding the current map proposal. **Specifically, we request that the Board of Alderman extend the timeframe for review and final vote by two weeks, through December 17, 2021, to ensure that concerns may be addressed, and community members have a meaningful and accessible opportunity to provide input.**

The way that the Legislation Committee has conducted this redistricting process is out of line with how governing bodies in other major cities have approached the map drawing process. To ensure the maps accurately reflect our diverse communities and give all St. Louisans the ability to participate, it is critical that the Board take the following steps.

I. Ensure Accessible and Meaningful Community Input:

St. Louis citizens have raised concerns about the lack of full community input throughout the duration of this process. On November 9, Action St. Louis, along with approximately 20 community organizations, submitted a letter to President Reed and the Legislation Committee requesting deeper community involvement in the redistricting process by demanding more advance notice of hearings and meaningful and accessible opportunities to present feedback. The letter noted insufficient advance notice, concerns about accessibility of the hearing process, a need for more detailed information on proposed boundaries and population data as well as text descriptions of the maps to ensure the ability for meaningful and accessible review. It asked that residents be allowed to testify by telephone to ensure access for those without video cameras. Community members aired similar concerns at a Press Conference held at City Hall on November 10. At subsequent public hearings, community organizations also requested: the ability for telephone testimony; that written testimony be available to the public; additional public posting of proposed maps in community spaces like public libraries; and engagement of community partners to ensure racial and ethnic minority communities have opportunity for participation.

Accessibility advocates echoed some of these concerns in a demand from Missouri Protection & Advocacy Services, Missouri Council of the Blind and National Federation of the Blind of Missouri in a November 23 letter to President Reed and the Legislation Committee, which raised concerns about the lack of text descriptions of proposed new ward boundaries, neighborhoods, and demographics; technological/video limitations for presenting public testimony that excluded individuals with disabilities; and incompatibility of the Board's website and public comment portal with screen reader software used by citizens with visual impairments. Because of these omissions, Saint Louisans with disabilities lacked

an equal opportunity to participate in the public comment process on the draft maps as required by Title II of the Americans with Disabilities and Amendments Act of 2008.

THEREFORE WE REQUEST that the Board ensure its citizen input process is accessible to all residents, including those with disabilities by adding text descriptions to draft maps (in plain language, with all of the information presented in the image format); by expanding accessibility of participation at public meetings by telephone for those unable to join via video; by ensuring adequate advance notice; by taking steps to ensure that all features of the redistricting website and public comment portal are compatible with screen reader software; and by ensuring that written testimony submitted is available to the public.

II. Extend Timeline for Community Feedback and Vote:

While the deadline for the final map is not until the end of December, and the BOA has a meeting scheduled on December 10, the current plan calls for a final vote on the map on Dec. 3rd. The current version of the map was not voted out of committee until Nov. 22, leaving barely 6 business days over a holiday week (including the day before Thanksgiving) for the community to review and provide feedback on the map. This is particularly pertinent for those who require the map to be translated into accessible formats or presented with auxiliary aids to be able to even begin to evaluate it. It is also crucial for those who wish to do a deeper review of the demographic consequences of this map not just for white and Black St. Louisans, but for all of the diverse residents of our city. Finally, this is important for those who want to consider the legal analysis of this map, which at the writing of this letter has not been provided yet, but which may provide crucial information about the map.

Due to insufficient advance notice of hearings, lack of detailed information on methodologies used to craft the maps necessary for meaningful review, questions about specific proposed ward lines, and inaccessibility for residents with disabilities, we implore the Board to allow additional time for public comment, with accommodations to promote the full participation of all Saint Louisians, through December 17, before a final vote.

THEREFORE WE REQUEST that the public be given ample time to review and provide feedback on this map by extending the public comment period and final vote by two weeks, through and no earlier than December 17, and in the meantime addressing the questions listed below.

III. Answer Constituent Questions & Provide Transparent Methodologies:

We further request responses to the below questions to ensure that citizens have the information needed to provide meaningful feedback. Specifically, we request information regarding the following questions related to the Nov. 22, 2021 proposed map approved by the Legislation Committee:

- Please share the methodology and detailed data and legal analysis for creation of the latest map. In particular, please release all relevant shapefile packages, to facilitate analysis of the map by community organizations, demographers, and geographers.
- The production of (so far) 6 versions of this map have happened behind closed doors, and without complete explanation of the persons involved, methodologies used, considerations brought to bear, and hard decisions made. Who was in the room when lines were being drawn? What are the precise data sets being applied, and where and from whom were these data sets acquired?
- How were the growing Hispanic and AAPI populations considered in the map-making? How were the growing population of new Americans considered in the map-making? How were those who are multiracial (F2) considered in map-making? How were the needs of the population of residents with disabilities considered in the map-making?
- How exactly were the demographic categories included with the maps created (for example: were Hispanics who identify as white included in the Hispanic category?).
- Why are Wards C & D not more compact? In particular, Ward D has a very uncompact shape. Other wards appear non compact as well. Non-compactness can be justified if the shape fulfills other requirements of map-making. However, there has been no reason given for these deviations from compactness.
- How were considerations of keeping neighborhoods together reconciled with the desire to break down segregation and barriers like the Delmar divide? How were considerations of issues including socioeconomic factors used to keep certain Census tracts together and others apart?
- Based on statements from President Reed and the Legislative Committee, as well as the map itself, it appears that maximizing the Black/white racial disparities in each ward is the dominant factor in proposed ward lines. There are compelling reasons, including maximizing representation from those areas that have seen racially-based neglect and disenfranchisement, for why the Black/white balance of wards is important. However, single-purpose redistricting also risks locking in the historic segregation that St. Louis is trying to dismantle. There is an opportunity to draw 2-4 wards in the center of the city that more accurately reflect the roughly even numbers of Black and white St. Louisans, thereby both bringing these populations together to collaborate, and giving non-Black people of color the opportunity to influence elections as balance voters between the two wards. Was this possibility considered? Why or why not? We welcome the opportunity to discuss these questions with you.

THEREFORE WE REQUEST that these questions are addressed in writing or in person at either a Community Town Hall and/or during the next aldermanic meeting.

Given the tight timeframes currently in place, we request that you respond to Vincent K. Heitholt, Missouri Protection & Advocacy Services at vincent.heitholt@mo-pa.org or (314) 256-9591 by **COB Thurs. Dec. 2, 2021** with actions you intend to take to address these concerns, specifically: (1) what steps you intend to take to ensure a meaningful and accessible public review process; (2) whether the public review period and vote will be extended; and (3) the time frame and process in which you can provide responses to the above listed questions.

Thank you for taking these steps to ensure that St. Louis' Redistricting process is meaningfully accessible and available to all St. Louis' residents.

Sincerely,

ACLU of Missouri
A. Philip Randolph Institute - St. Louis Chapter
Action St. Louis
Coalition of Black Trade Unionists St. Louis Chapter
Conversations for Political Change
Dance the Vote
Hispanic Leaders Group of Greater St. Louis
Hispanic Chamber of Commerce of Metropolitan St. Louis
Indivisible St Louis
In Every Generation
Jewish Community Relations Council of St. Louis
League of Women Voters of Metro St. Louis
Metropolitan Congregations United
Missouri Asian American Youth Foundation
Missouri Council of the Blind
Missouri Faith Voices
Missouri Protection & Advocacy Services
Missouri Voter Protection Coalition
Mound City Bar Association
NAACP-St Louis County
National Council of Jewish Women St. Louis
National Federation of the Blind of Missouri
PROMO
St. Louis Area Voting Initiative
St. Louis Area Voter Protection Coalition
Show Me Integrity
VITENDO4AFRICA
Women's Voices Raised for Social Justice