



June 29, 2020

President Edward J. "Ted" Costa  
San Juan Water District  
PO Box 2157  
Granite Bay, CA 95746

Re: *Proposed "By District" Map*

Dear President Costa,

The undersigned Presidents of the Citrus Heights Water District and Fair Oaks Water District ("Retail Agencies"), on behalf of their respective Boards of Directors representing over 60% of SJWD wholesale water service connections, request that you and your colleagues draft electoral maps consistent as possible with the attached draft map. This map, prepared in consultation with the Retail Agencies' demographer, proposes electoral districts that most closely align to established county, city, neighborhoods, and other communities of interest.

The preparation of voting district maps requires compliance with state and federal requirements. Perhaps the most important requirement is the long-recognized "one-person, one vote" standard, which requires all voting districts be as nearly equal in population as practicable. Other factors that should be considered in preparing voting district boundaries are using identifiable geographies, ensuring districts are contiguous, and ensuring compactness. Drawing districts solely to accommodate the place of residence of any sitting Director or candidate is not an appropriate consideration.

Enclosed is a map we recommend that SJWD utilize. We have examined a number of possible permutations for drawing maps, and this approach most closely aligns with state and federal requirements and considerations. This map draws districts largely based on established county, city, neighborhoods, and other communities of interest. Specifically, districts endeavor to respect the municipal boundaries of Citrus Heights, Folsom, and Roseville and the boundaries of the census designated places of Carmichael, Fair Oaks, Granite Bay, and Orangevale. This approach respects and utilizes these existing communities as natural proxies for electoral districts.

On behalf of the Retail Agencies, we request that the SJWD Board utilize the enclosed proposed map when drawing its electoral districts.

President Edward J. "Ted" Costa  
Proposed Map  
June 29, 2020

Sincerely,



Ray Riehle  
President  
Citrus Heights Water District



Gary Page  
President  
Fair Oaks Water District



cc: Board of Directors of CHWD  
Board of Directors of FOWD  
County of Sacramento

Attachment

**Exhibit A: Attachment 1**  
**San Juan City Plan Letter**

The goal of the California Voting Rights Act is to convert districts like San Juan Water District into by-area election systems in which the residents can have a true voice in their local elections. A key to the CVRA is the issue of representation for local “Communities of Interest” which should serve as the building blocks for any districting plan.

A key community of interest under the CVRA is the ethnic population that is represented by the San Juan Water District Board of Directors. In the case of the San Juan Water District, that is most likely to be the Latino community, with roughly 18,000 residents based on the last US Census. Second in their ethnic concentration would be the Asian population at nearly 6,000 residents. This is something your staff and demographer have done an excellent job of demonstrating in your June 10<sup>th</sup> presentation

However, anyone who has lived in the San Juan District knows that there are more ways to define the district than race or ethnicity. One key Community of Interest is simply the city or unincorporated community in which we live. Residents identify with their area as a community of interest. Other communities of interest for the purposes of this redistricting might be the local water district, major streets and thoroughfares that divide the area, and the rural and suburban, even more urban communities.

We utilized these communities of interest, incorporating data from the US Census and other sources, to create a sensible districting plan for your consideration. We are calling it the “City and Census Place Plan” and have devised it to be a fair and easily understood plan that achieves the goals of the CVRA and can serve as the foundation of the San Juan Water District’s election boundaries for decades to come.

The City and Census Place plan meets several criteria of the districting process under the Federal Voting Rights Act, the California Voting Right Act and other sections of California law dealing with redistricting.

- The plan achieves population “equality” utilizing the rule that no district is more than 10% larger or smaller than another. The total deviation (sum of the absolute values of the deviations of the smallest and largest) is just 5.5% when using the 2010 US Census total population count - well within the 10% rule.
- The plan respects the rules of compactness in California which state that districts should not bypass nearby population for people farther away. The California rule on compactness favors districts that are rational, can be understood by voters, and do not have serpentine or unnaturally elongated, strange shapes. This plan is very compact and each shape is based on rational criteria.
- The plan recognizes the Latino population within the Citrus Heights area as a Community of Interest, allowing for two districts, one at 11.3% Latino and one at 13.1% Latino utilizing the Citizen Voting Age Population from the most recent American Community Survey dataset.
- The plan makes district boundaries align with both the legal physical boundaries of the underlying cities and recognized census places (unincorporated communities) and follows where residents identify their community. For example, the boundary between Orangevale and Fair Oaks is drawn not at the census place boundaries, but where residents identify “Fair Oaks” as their residence on their voter registrations. Resident identification is a strong indication of a

municipal Community of Interest.

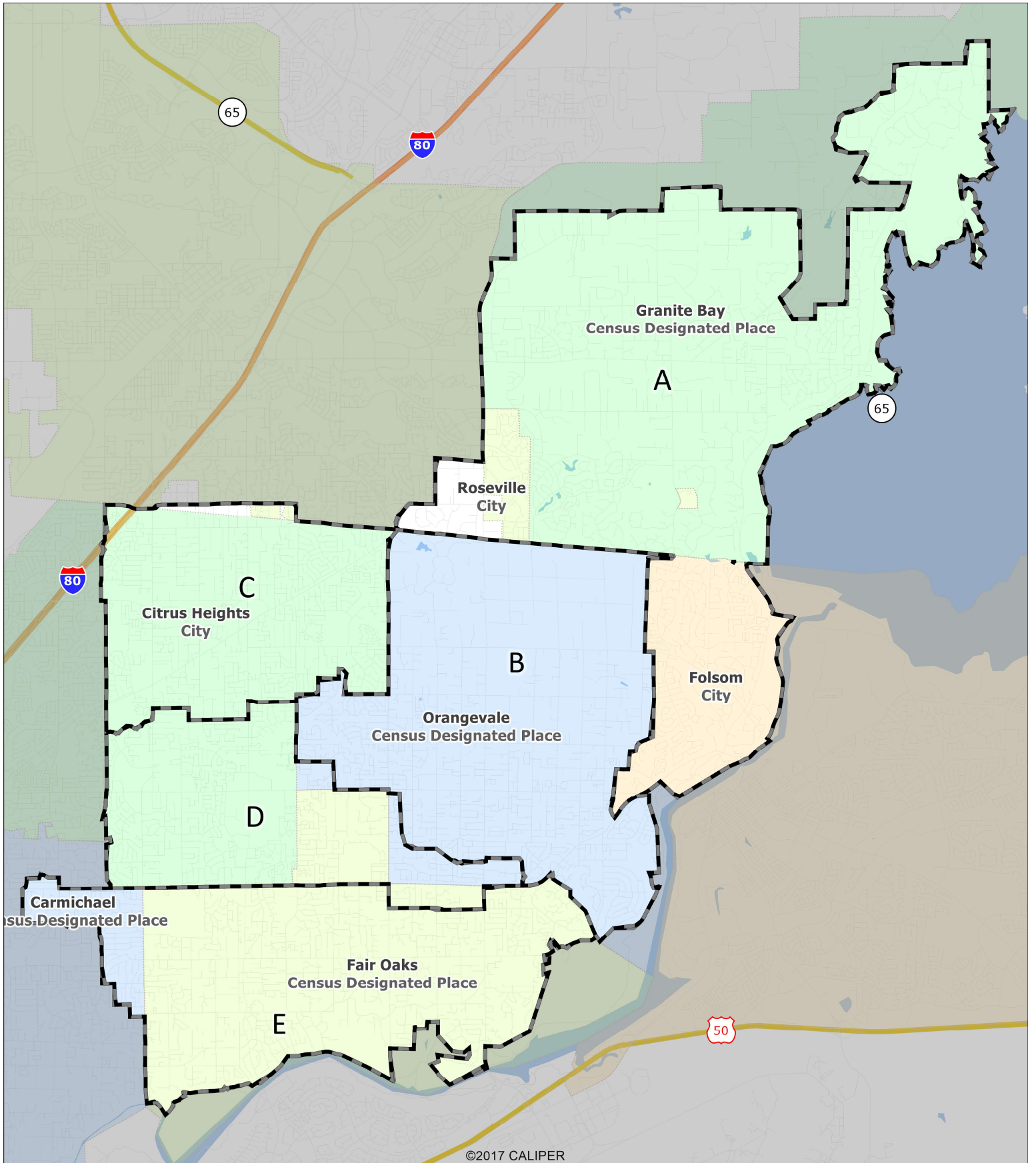
- The plan does not consider where members of political parties, current board incumbents or candidates reside. This is consistent with the new Fair Maps laws which are being mandated upon counties and cities and are a best practice for municipal redistricting.

Attached please find several maps which illustrate the sensible boundaries utilized in this plan.

- 1) In Exhibit A-Attachment 2, "City based Plan with Census Places", is a map which shows the overlay of the proposed new districts with the cities and "census places" – unincorporated areas identified by the US Census. This is the first look at how the plan is utilizing this very clear and well-understood way that residents of our area identify their community of interest.
- 2) In Exhibit A-Attachment 3, "City based Plan with Census Places with Registered Voters", is the same as #1, but this map includes nearly 100,000 geocoded voters of the San Juan Water District and is coded by their self-identification of their "city" on voter registration forms. This is most significantly used:
  - a. as the justification for putting the eastern arm of the district into District E as the majority of that community identifies as Fair Oaks, and,
  - b. for the division of Districts D and B, following this line as the boundary between those two districts.

**Exhibit A- Attachment 2**

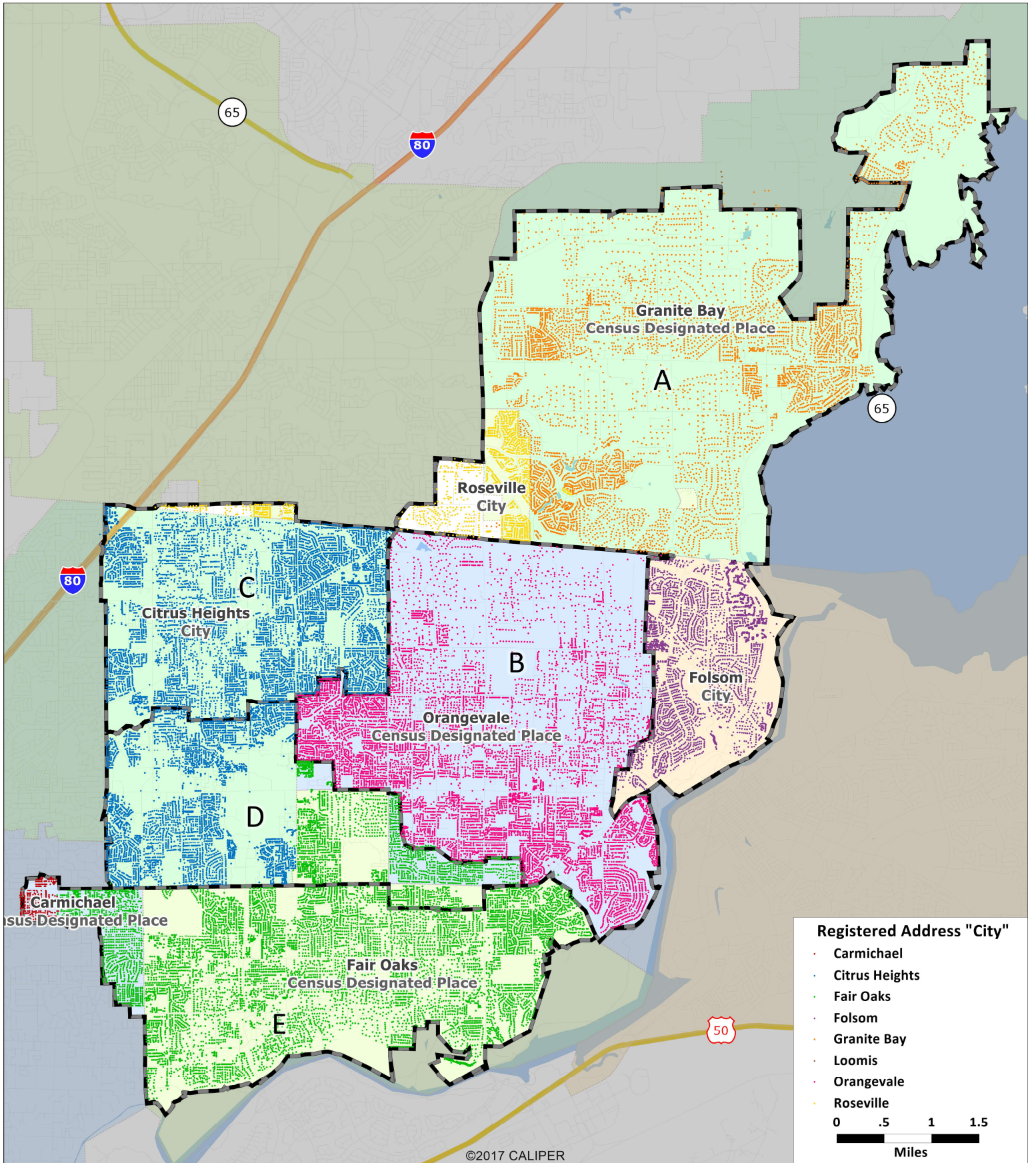
**Proposed Map: City Based Plan with Cities**



**Exhibit A- Attachment 3**

**Proposed Map: City Based Plan with Registered Voters**





**Registered Address "City"**

- Carmichael
- Citrus Heights
- Fair Oaks
- Folsom
- Granite Bay
- Loomis
- Orangevale
- Roseville

