

Comment Regarding District Maps Agenda Item 5.1, October 10, 2023

Dear Mayor Khan and Councilmembers,

As a resident of the Lower Peters Canyon neighborhood, I urge you to adopt a district map that maximizes opportunities for AAPI candidates while respecting communities of interest and easily recognizable boundaries, especially for the underrepresented communities north of I-5. The maps that meet these criteria are 148, 162, 163, 164, and 166. I will focus on 148, followed by a brief discussion of alternative maps.

[Map 148](#) has one district for each point on the compass, with two very compact central districts bordered by freeways. I live in **District 1**, the northern district, which unites the villages that border Tustin, including the Irvine portion of the Tustin Union School District [service area](#). The district is indeed somewhat Tustin facing. Many residents of these neighborhoods shop at the Tustin Ralphs on Jamboree, the Tustin Market Place Sprouts, and Whole Foods in the District. Both the Market Place and The District are popular destinations for retail, dining, and movies. For the many Kaiser Permanente members living in these neighborhoods, the closest medical offices are in Tustin Ranch. While some have criticized the length of this district, the northern end includes the uninhabited Loma Ridge and adjacent open space. Moreover, the district has a very similar adjacent counterpart in [Tustin's District 3](#), which runs the length of Tustin Ranch. The villages and neighborhoods within this district are connected by the Peters Canyon and Hicks Canyon trails, popular routes for active transportation and recreation. District 1's AAPI CVAP is 48%, a substantial plurality.

To the east, **District 3** consists primarily of the newer communities east of highway 133, which differ markedly from the mature Irvine Company villages to the west. It is centered on the Great Park, in recognition of the distinct community of interest shared by the Great Park Neighborhoods. Residents of these neighborhoods share a lack of retail centers, requiring them to drive miles for food and other essentials, contributing to increased traffic. They are also subject to high Mello-Roos taxes, resulting in media reports of [taxation without representation](#). The configuration of District 3 gives Great Park residents the opportunity to elect one of their own to the Council, without having their votes diluted by the those from established villages such as Woodbury and Cypress Village. District 3's AAPI CVAP is 44%, a slight plurality presenting an opportunity for AAPI candidates.

To the south, **District 5** is centered on Turtle Rock, and includes of some of Irvine's oldest villages such as University Park. To the west, **District 6** combines UCI with IBC, reflecting a community of interest made up predominantly of renters, many of whom are students. In the geographic center of Irvine is **District 4**, bordered by the easily identifiable boundaries of I-5, I-405, Culver, and Sand Canyon. It includes the mature villages of Woodbridge, Deerfield, El Camino Real, and Oak Creek, which comprise a community of interest based on common retail, recreation, and schools.

Finally, on the northern side of I-5 is **District 4**, a compact district with the easily identifiable boundaries of I-5, Highway 133, Culver and Hicks Canyon Trail. Included are the villages of Woodbury, Cypress Village, and Northwood, which also comprise a community of interest based on retail, recreation, and schools. District 4's AAPI CVAP is 42%, a near-plurality which presents a reasonable opportunity for a third AAPI seat.

In sum, Map 148 utilizes easily identifiable boundaries such as freeways and avoids division of villages to the greatest extent possible. It logically groups communities of interest and maximizes opportunities for AAPI representation.

However, no map is perfect; the need to satisfy the prescribed legal criteria necessitates trade-offs. Map 148 has been criticized for excluding an apartment complex with a high percentage of students from District 6, and for including two incumbent councilmembers within District 5. I have submitted two new maps to address these criticisms, [164](#) and [166](#). Both maps maintain Map 148's lines for the three northern districts (albeit with different numbering) while placing Rancho San Joaquin with UCI in response to student concerns and placing University Park with Woodbridge instead of Turtle Rock to avoid the two incumbent problem. Maps 164 and 166 maintain the same high AAPI CVAP percentages in the three northern districts.

Meanwhile, National Demographics submitted Maps 162 and 163, both of which are very similar to 166, but with significant differences. Map [162](#) places University Park in the Woodbridge district, but also place Rancho San Joaquin in that district instead of the UCI district. Map 162 retains Map 148's boundaries for Districts 1, 2, and 3, so the high AAPI percentages remain unchanged. Map [163](#) groups Rancho San Joaquin with UCI, satisfying student concerns, but groups University Park with Turtle Rock rather than Woodbridge. Its configuration of District 1 is somewhat different from 148, 162, 164, and 166, which results in a lowering of AAPI CVAP from 48% to 44%. This is still a significant plurality, so the opportunity for three AAPI councilmembers remains high.

For the reasons I've stated, Maps 148, 162, 163, 164, and 166 are all satisfactory to me, especially in their treatment of the neighborhoods north of I-5. They differ only in their treatment of districts south of I-5. Given the fact that the northern neighborhoods are severely underrepresented on the current Council, I believe it is important that you select a map that facilitates fair representation for these neighborhoods while maximizing opportunities to elect a future Council that's representative of Irvine's diversity.

I strongly oppose Maps 135, 151, and 165 for their failure satisfy those criteria. [Map 135](#) divides communities of interest in seemingly arbitrary ways. The Great Park Neighborhoods are divided among four districts, including one that takes in a large chunk of Woodbridge. At the same time, 135 creates sprawling districts that include far-flung and disparate communities. District 6 stretches from Lower Peters Canyon on the Tustin border to the far reaches of Portola Springs on the Lake Forest border. It provides only two districts with AAPI CVAP exceeding 39%, and only one AAPI plurality district.

[Map 151](#) blithely ignores easily identifiable boundaries such as I-405 and Highway 133, and needlessly divides villages. Lower Peters Canyon is arbitrarily divided at Bryan Avenue, so that

Beckman High School is in District 3, while the vast majority of its service area is in District 1. Northwood is divided between Districts 1 and 3. The latter district, bisected by I-5, includes most of Northwood with Westpark II. Even worse, District 2 jumps Highway 133 to group the Great Park with the distinctly different Irvine Company villages of Woodbury and Cypress Village. These neighborhoods do not share a community of interest. The Great Park Neighborhoods have distinct needs that would likely be submerged by the greater voting power of Woodbury and Cypress Village. Map 151 also groups Rancho San Joaquin and its student voters with Woodbridge instead of UCI. Like Map 135, 151 has only two districts with AAPI CVAP exceeding 39%.

[Map 165](#) is highly derivative of 151 and reiterates most of the above defects. The only substantial difference is that it groups Rancho San Joaquin with UCI. Minor boundary changes have the effect of nudging District 1's AAPI CVAP up from 39% to 40%, but at the expense of exacerbating the split of the Tustin School District service area between Districts 1 and 3. Still, this map is decidedly less favorable for AAPI representation than Maps 148, 162, 163, 164, and 166.

I have been deeply engaged in this process from the beginning and am grateful that my contributions have been well received and have played a substantial role in the ongoing discussion. I have never expected the final map to be all that I want, but have hoped to achieve a result that is fundamentally fair and democratic. I've identified five maps that satisfy my essential concerns—and three that do not. Maps 135, 151, and 165 are fundamentally unacceptable to me. I strongly urge you to adopt one of the other five.

Thank you for your attention.

Sincerely,
Doug Elliott