

January 22, 2021

California Citizens Redistricting Commission
Subcommittee on Language Access
901 P Street, Suite 154-A
Sacramento, CA 95814
Sent via electronic transmission

Dear Commissioners Akutagawa and Fernandez,

We commend your commitment to incorporating translation and interpretation practices into your outreach and public meeting plans. All of the undersigned organizations have plans to reach out to and engage limited English proficient (“LEP”) community members in the state redistricting process. We drew upon our respective organizations’ rich histories of working with these communities to offer up the following recommendations on how the Commission can strengthen your language access plans to best meet the needs of our state’s diverse population.

First, it’s crucial to expand language assistance beyond the languages covered under the California Secretary of State’s language minority determinations for voting. These language requirements are a reasonable starting place; however, they categorically exclude languages from Europe, the Middle East, and Africa due to statutory definitions. The Commission’s assessment of language needs for Californians should not similarly erase whole communities. Additionally, communities who are more dispersed throughout a region may be done a disservice by relying on the assessment provided by precinct- and county-based formulas for voting, given the Commission’s intent to use a regional approach in outreach efforts. **We recommend the following adjustments to the list of covered languages:**

- **The reclassification of Korean as a “Recommended Statewide Language”.** There are approximately 215,000 LEP Korean speakers who live in California, which is approximately 50,000 fewer than the number of LEP Tagalog speakers. Given that Tagalog is included as a statewide language, Korean should be as well.
- **The addition of American Sign Language (ASL) as a “Recommended Statewide Language”.** Efforts to provide interpretation and translated materials should include ASL.
- **The addition of the following languages as “Recommended Area Specific Languages” for the indicated zones.** This list reflects recommendations by groups working on civic engagement in these zones and analysis of the number of LEP speakers in each zone. While some of these languages were previously identified in Column C as optional languages, regional interpretation coverage should be provided due to the size and planned engagement of these communities.
 - Bay Area/Zone C: Amharic, Arabic, Farsi, Hindi, Russian
 - Sacramento/Zone D: Arabic, Dari, Pashto
 - Central Valley/Zone F: Arabic
 - Los Angeles/Zone H: Amharic, Arabic, Bengali, Hindi, Russian
 - Inland Empire/Zone I: Arabic, Farsi, Punjabi

- Orange County/Zone J: Arabic
- San Diego/Zone K: Haitian Creole, Farsi, Korean, Oromo, Somali, Swahili
- **Clarification that if a language is identified as a “Recommended Area Specific Language” for a county, it will be covered for the whole zone.** Since outreach will be done regionally and communities are not always strictly confined within county lines, the existence of a significant LEP community in a county should result in the corresponding language identified in Column B being covered for any hearing or materials related to that Zone.

Second, we are sympathetic to the challenges of determining which materials will be prioritized for translation for which languages. **We offer the following recommendations to inform your allocation of resources for translating materials:**

- **Materials with more detailed content should be translated into the top 12 languages spoken in California, at a minimum.** This includes content like Redistricting 101, trainings, or information about how to provide input. The languages are Spanish, Chinese (Traditional and Simplified for written, Cantonese and Mandarin for spoken), Vietnamese, Tagalog, Korean, Armenian, Farsi, Arabic, Russian, Japanese, Punjabi, and Khmer.
- **Materials with higher-level content and those that are meant for outreach should be translated into the top 12 languages (listed above) as well as additional languages being covered as “Area Specific Languages”.** This would include content like general outreach flyers, generic flyers for meetings (with space for specific details to be added), social media content.
- **Consider the specific needs of language communities when translating materials.** Commissioners should work with language communities within their assigned regions to learn more about which mediums are preferred. It may be more effective to reach some communities via audio/visual content instead of written materials, or vice versa, and this can inform the prioritization of certain translations.
- **Make key materials available in an editable format as a backstop for languages that aren’t translated.** At the very least, this will more easily enable community groups who may want to create translated materials to do so.
- **Provide translations and interpretations, rather than relying on community-based organizations to do so.** While it is important to work with community based organizations to identify the needs of their communities, the Commission should commit adequate resources for the work and cost of producing high quality translated materials. This will enable community based organizations to focus on effectively engaging community members rather than shouldering the burden of translation.

Finally, we recognize that this subcommittee is working on one piece of a much larger logistical puzzle that involves a great deal of planning. **We offer these additional recommendations to help ensure that LEP community members can fully participate in the Commission’s proceedings:**

- **Set aside a budget and create a process for community members to request interpretation even if their language is not initially covered.** California's diversity may preclude the ability to predict every language that the Commission will receive testimony in, but your process can plan for that uncertainty by maintaining some flexibility to accommodate additional language needs.
- **Plan for how to translate incoming written testimony in non-English languages in a timely fashion and clearly communicate any timelines associated with translation so community members can plan accordingly.** If there may be a delay in the Commission considering a community member's testimony or comment due to translation processing, this should be made clear so that LEP community members know to submit early if possible. The translation process should be set up to avoid any situation that could result in the commission receiving a community member's submission after a vote or other pertinent deadline.

We hope that you will find all of these recommendations helpful in your work to create language accessibility within the redistricting process. We are happy to answer any questions that you have or serve as a resource as you finalize these plans. Please feel free to reach out to Adria Orr (adriao@advancingjustice-alc.org) and Julia Marks (juliam@advancingjustice-alc.org) at Asian Americans Advancing Justice - Asian Law Caucus to follow up.

Sincerely,

Alliance San Diego
 Asian Americans Advancing Justice - Asian Law Caucus
 Asian Americans Advancing Justice - Los Angeles
 Asian Law Alliance
 AAPIs For Civic Empowerment - Education Fund
 California Black Census and Redistricting Hub
 California Common Cause
 California League of Conservation Voters Education Fund
 CAIR San Francisco Bay Area
 Council on American-Islamic Relations - Sacramento Valley / Central California
 Disability Rights California
 Hmong Innovating Politics
 Jakara Movement
 League of Women Voters of California
 Orange County Civic Engagement Table
 Mi Familia Vota
 Partnership for Advancement of New Americans