December 10, 2018

Prepared and

Submitted by: C. Compton (Approved by: Paul A. Cook

#### **PUBLIC HEARING**

# EVALUATING A CHANGE IN THE ELECTIONS PROCESS FOR THE IRVINE RANCH WATER DISTRICT BOARD OF DIRECTORS AND ESTABLISHING DIVISION BOUNDARIES

#### SUMMARY:

Pursuant to Water Code section 35180, IRWD uses an at-large method to elect the members of its Board of Directors. The at-large method allows for voters from the entire service area to elect each of the five members of the Board of Directors. The California Voting Rights Act favors a by-division method of election instead of an at-large method of election for electing members of local government governing bodies. A by-division method divides a service area into separate divisions and allows the voters from each division, as opposed to voters from the entire service area, to elect a member of the board of directors. In a by-division method of election, the elected individual serves as the division's representative on the board and must reside in that division.

Since 2017, Elections Code section 10650 has authorized special districts such as IRWD to move from an at-large method of election to a by-division method of election in furtherance of the purposes of the California Voting Rights Act. Elections Code section 10010 governs the process for evaluating and transitioning to a by-division method of election. The first step in initiating the process is the adoption of a resolution of "Intent to Initiate the Process of Establishing Divisions and Elections by Divisions." The IRWD Board of Directors adopted a resolution of "Intent to Initiate the Process of Establishing Divisions and Elections by Divisions" on April 2, 2018. The next steps involved a series of public hearings.

Pursuant to Elections Code section 10010, a public hearing is now being held on December 10 after the drawing of draft maps. The purpose of this hearing is to invite and solicit public comments on the draft division maps, which have been published by the District on its website, and the potential sequence of elections for the directors from each division at different times to provide for staggered terms of office.

#### RECOMMENDED HEARING PROCEDURE:

President: Declare the Board meeting of December 10, 2018, to be the time and place

for a third hearing on evaluating a change in the elections process for the Irvine Ranch Water District Board of Directors and establishing division boundaries, and asks the Board Secretary to announce how the hearing

was noticed.

Board Secretary: Announce that the hearing was noticed by publication in the *Orange* 

*County Register* on Sunday, November 25, 2018; by publication in Spanish in the *Excelsior Unidos* on Friday, November 23, 2018; by publication in Korean in the *Korea Times* on Saturday, November 24, 2018; by publication in English and Traditional Chinese in the *World* 

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Journal on Saturday, November 24, 2018, and Sunday, November 25, 2018; by publication in Farsi in *Hafteh Bazaar* on Friday, November 30, 2018; by electronic posting in English, Farsi, Korean, Traditional Chinese, and Spanish on the IRWD website, through which the notice can be translated into approximately 20 languages; and by physical posting at IRWD's headquarters. Announce that the four draft maps— Map A, Map B, Map and Map D— were published on IRWD's website by December 3, 2018. The Board Secretary presents affidavits of posting and proof of publication to the Board related to the hearing.

Board of Directors:

The Board of Directors receives and files the affidavits of posting and

proof of publication as presented by the Board Secretary.

President:

Request legal counsel to describe the nature of the proceedings, and to

explain the purpose of the hearing.

Legal Counsel:

Describe the nature of the proceedings, and explains the purpose of the hearing as being the opportunity to invite and solicit public comment on the draft division maps, which have been published by the District on its website at least seven days prior to the hearing, and the potential sequence of elections for the directors from each division at different times to

provide for staggered terms of office.

Board of Directors:

Open the hearing by taking the following recommended action:

RECOMMENDED MOTION: THAT THE PUBLIC HEARING BE OPENED TO SOLICIT AND ACCEPT COMMENT ON THE PROPOSED MOVE TO BY-DIVISION ELECTIONS, THE

COMPOSITION OF DIVISIONS, THE DRAFT DIVISION MAPS, AND

SEQUENCE OF ELECTIONS.

President:

Request that the Government Relations Officer provide a report to the Board regarding the draft division maps, and on any written comments received.

Government

Relations Officer:

Provide a report to the Board regarding the draft division maps, and on

any written comments received.

President:

Inquire whether there is any person present who wishes to provide comments on the proposed move to by-division elections, the composition of divisions, the draft maps, and the sequence of elections.

Inquire whether there are any comments or questions from members of the Board of Directors. After comments or questions, states that the hearing

will be closed.

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Board of Directors: Close the hearing by taking the following recommended action:

RECOMMENDED MOTION: THAT THIS THIRD PUBLIC HEARING BE CLOSED AND AUTHORIZE STAFF TO AGENDIZE A FOURTH PUBLIC HEARING FOR JANUARY 14, 2019, FOR THE BOARD OF DIRECTORS TO SOLICIT AND ACCEPT COMMENT ON THE PROPOSED MOVE TO BY-DIVISION ELECTIONS, THE COMPOSITION OF DIVISIONS, THE DRAFT DIVISION MAPS, AND SEQUENCE OF ELECTIONS.

#### BACKGROUND:

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In 2002, Governor Gray Davis signed the California Voting Rights Act (CVRA) into law. The CVRA states that an at-large method of election may not be used to elect local governing boards if it "impairs the ability of a protected class to elect candidates of its choice or its ability to influence the outcome of an election." (Elections Code §14027)

A violation of the CVRA may be established if it is shown that racially polarized voting, combined with an at-large voting system, impairs the ability of a protected class of voters to elect candidates of its choice or to influence the outcome of an election. (Elections Code §14028(a)) Under the CVRA, "racially polarized voting" means voting in which there is a difference between the choice of candidates or other electoral choices that are preferred by voters in a protected class, and in the choice of candidates and electoral choices that are preferred by voters in the rest of the electorate. (Elections Code §14026(e))

As of the writing of this report, IRWD has not been presented with any evidence of racially polarized voting in its elections, but many local governments have had their at-large method of election challenged under the CVRA. Additionally, many local governments have voluntarily moved to a by-division method of election because it is the only election method not vulnerable to a challenge under the CVRA.

#### Statutorily Mandated Process for Evaluating a By-Division Method of Election:

While the current at-large method of election used by IRWD pursuant to Water Code section 35180 has served the District's customers and constituents well, Elections Code section 10650 allows the board of a special district, like IRWD, to move from an at-large method of election to a by-division method of election in furtherance of the purposes of the CVRA.

Elections Code section 10010 provides the process for evaluating divisions and a transition to by-division elections. That process requires, at a minimum, that a special district:

- Adopt a resolution of intent to change the election system;
- Hold at least four public hearings to discuss division maps and the sequence of the division elections:

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- O The first and second hearing must be held within 30 days of each other and the public is invited to provide input regarding the composition of the divisions and sequence of elections;
- O After draft division maps are drawn, one or more proposed maps are published at least seven days before the third hearing. Any further revisions to the proposed map(s) would be published at least seven days before being adopted; and
- o The third and fourth public hearings are held within 45 days of each other; and
- Hold at least one more public hearing at which it considers final action to transition to bydivision elections and considers adoption of a final map of division boundaries.

#### Legally Required Factors Considered When Evaluating Division Boundaries:

While a number of federal and state laws govern the drawing of division boundaries, the U.S. Constitution establishes the fundamental principle which governs the drawing of division boundaries. Above all else, the Constitution requires that divisions be equal, or nearly equal, in total population. Federal courts have ruled that this means that the population difference between the most and least populous divisions may not exceed ten percent. California Elections Code section 22000 further suggests that divisions should be drawn to be, "as far as practicable, equal in population" using the population numbers from the last federal decennial census.

Provided that the equality in population, based on the last decennial census, requirement is met, the Elections Code also allows for consideration of: (1) topography, (2) geography, (3) cohesiveness, contiguity, integrity, and compactness of territory, and (4) communities of interests of the division" when determining where division boundaries are placed.

#### IRWD Process to Evaluate Establishment of Divisions and Elections by Divisions:

On April 2, 2018, the IRWD Board of Director adopted a resolution of "Intent to Initiate the Process of Establishing Divisions and Elections by Divisions." In its adoption of the resolution, the Board determined that the public interest was best served by initiating the process to evaluate divisions and a transition to by-division elections. The Board authorized the General Manager, or his designee, to initiate a public evaluation process that complies with Elections Code section 10010, and encourages and allows for full public participation, careful consideration and input into an evaluation of divisions and a transition to by-division elections within IRWD.

The first step in the District's evaluation process was the release of data related to the population characteristics of the IRWD's service area. That data was presented to the Board during a Board workshop on May 14, 2018. Attached as Exhibit "A" is a copy of the summary of "Existing Conditions for Irvine Ranch Water District" provided to the Board.

The second step in the District's evaluation process was to hold two public hearings, which were held on June 4 and June 18. These hearings were conducted before the drawing of a draft map or

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maps of proposed division boundaries. The purpose of the hearings was to invite and solicit public comment on the proposed move to by-division elections, the composition of divisions and the sequence of elections prior to the drawing of draft maps.

The third step in the District's evaluation process was for the Board to discuss criteria to be used by the District when drawing proposed director division boundaries. The criteria was discussed at a Board Workshop held on August 13, 2018. The criteria discussed at the August 13 workshop is included in the presentation materials attached as Exhibit "B".

Following the workshop, prior to the drawing of potential division area maps, the District invited the public to submit additional comments on the composition of possible divisions and to submit conceptual maps for consideration as the potential division area maps were drawn. That public comment period ran from August 15 to October 15, 2018. During the comment period, the District received two comments and maps from the public. Those comments and maps are attached as Exhibit "C".

Now, IRWD is holding a third public hearing to invite and solicit public comment on the draft division maps, which have been published by the District on its website, and the potential sequence of elections for the directors from each division at different times to provide for staggered terms of office. The four draft maps are attached as Exhibit "D".

It is important to note that the draft maps are a starting point for the Board's discussion on possible division boundaries, and additional maps or refinements may be made should the Board want to see other options at the next public hearing.

#### **FISCAL IMPACTS:**

Due to the adoption of a resolution of "Intent to Initiate the Process of Establishing Divisions and Elections by Divisions" and by undertaking the Elections Code section 10010 process to evaluate by-divisions elections, the District is incurring costs of a demographer and special legal counsel in addition to potentially other costs.

#### **ENVIRONMENTAL COMPLIANCE:**

Not applicable.

#### **COMMITTEE STATUS:**

This item was not reviewed by a Committee.

#### LIST OF EXHIBITS:

Exhibit "A" – Existing Conditions for Irvine Ranch Water District

Exhibit "B" – Presentation Materials from the December 10, 2018, Public Hearing

Exhibit "C" - Public Comments and Maps Received Between August 15 and October 15, 2018

Exhibit "D" - Draft Division Maps A, B, C and D

### **Existing Conditions for Irvine Ranch Water District**

Table 1. Population by Race/Ethnicity for IRWD

	Number	Percent
2010 Total Population	337,151	100.0%
Hispanic or Latino of any Race	40,325	12.0%
Non-Hispanic White	171,195	50.8%
Non-Hispanic Asian	104,775	31.1%
Non-Hispanic Black or African-American	5,173	1.5%
All Other Non-Hispanic Races/Ethnicities	15,681	4.7%
2010 Population 18 Years and Older	261,651	100.0%
Hispanic or Latino of any Race	28,531	10.9%
Non-Hispanic White	138,759	53.0%
Non-Hispanic Asian	81,062	31.0%
Non-Hispanic Black or African-American	4,029	1.5%
All Other Non-Hispanic Races/Ethnicities	9,266	3.5%
2016 Citizen Voting Age Population (CVAP)	244,343	100.0%
Hispanic or Latino of any Race	27,413	11.2%
Non-Hispanic White	135,507	55.5%
Non-Hispanic Asian	68,731	28.1%
Non-Hispanic Black or African-American	4,810	2.0%
All Other Non-Hispanic Races/Ethnicities	7,879	3.2%

Sources: 2010 Decennial Census P.L. 94-171 Redistricting Data;

U.S. Census Bureau American Community Survey 5-year estimates, 2012-2016

The target director division population is calculated by dividing the total population by the number of board members.

Table 2. Target Population for Division Scenarios

Division ID	Division Type	Total 2010 Population	Target Population for Each Division	Division Majority (50% + 1)	Majority of CVAP (50% +1)
5	5-Division Plan	337,151	67,430	33,716	24,435

# **PUBLIC HEARING**

BOARD OF DIRECTORS DISTRICTING DRAFT MAPS

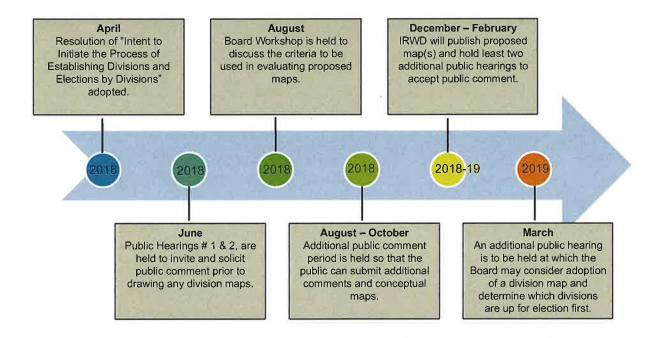
December 10, 2018



# Presentation Agenda

- Review of Process and Timeline for Evaluation
- Proposed Sequencing of Elections
- Review the Criteria for Drawing Division Boundaries
- Review of Draft Maps
- Discussion

# Process for Evaluating a Change of Election Method and Director Division Boundaries



Irvine Ranch Water District

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# **Goal for Today**

- Review and discuss proposed sequencing of elections.
- Review and discuss the draft maps.
  - Are any of the maps not viable?
  - Are there revisions you would like to see made to the draft maps?
  - Prioritization.

# **Proposed Sequencing of Elections**

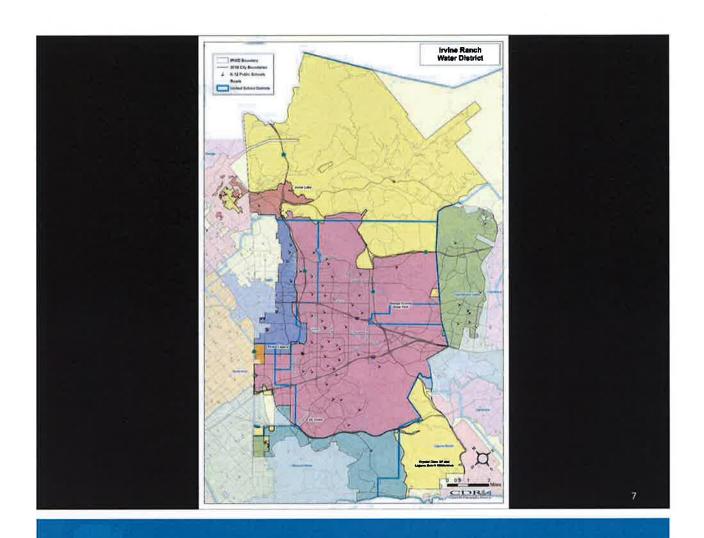
- If adopted, new divisions would take effect for the 2020 election.
- Propose to sequence elections with existing staggered terms of board members.
  - 2020: Two divisions up for election
  - 2022: Three divisions up for election

Irvine Ranch Water District

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# IRWD Criteria for Drawing Division Boundaries

- Each director division shall contain a nearly equal number of inhabitants as reflected in the most recent decennial census.
- 2) Divisions shall be drawn in a manner that complies with the Federal Voting Rights Act.
- 3) Divisions shall consist of contiguous territory.
- 4) Divisions will be in as compact a form as possible given the other criteria set forth.
- 5) Division boundaries will respect communities of interest as much as possible.
- 6) Division boundaries will consider jurisdictional boundaries as much as possible.
- 7) Division boundaries will observe topography and geography such as man-made and natural geographic features insofar as practicable.
- 8) Division boundaries will attempt to allow the voters to retain current Directors if they choose by avoiding placing Directors in the same division insofar as this does not conflict with federal or state law requirements.
- To the extent proposed divisions do not contain equal population as reflected in the most recent decennial census, population growth since the last decennial census and anticipated population growth before the next decennial census may be considered so long as population deviation remains within the parameters allowed by law.

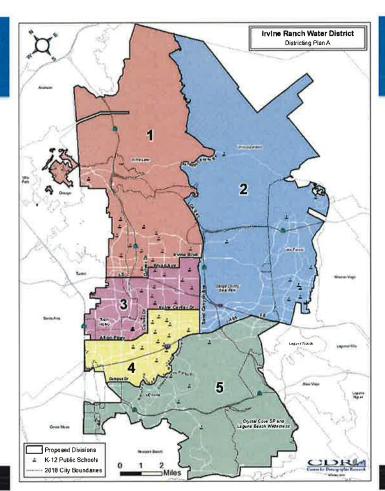


# Summary of Plans

Мар	Percent Spread	Contiguous Divisions?	Viable?
Plan A	3.19%	Yes	Yes
Plan B	8.60%	Yes	Yes
Plan C	6.89%	Yes	Yes
Plan D	4.90%	Yes	Yes

# Plan A

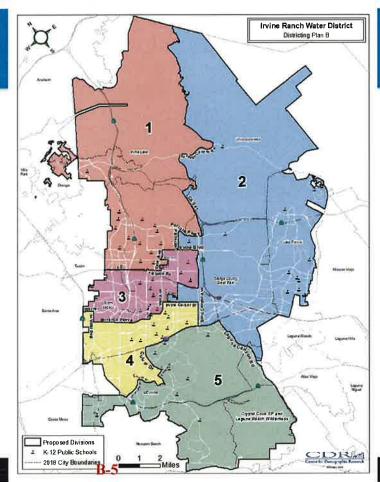
Plan A
Percentage Spread:
3.19%



Irvine Ranch Water District

Plan B

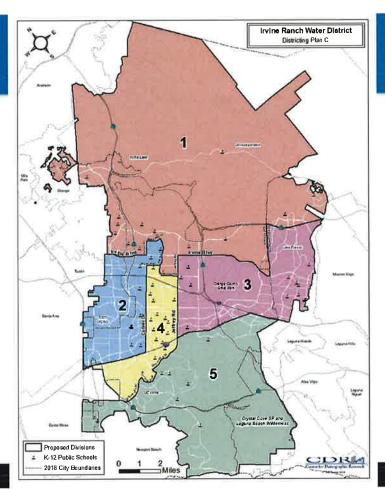
Plan B Percentage Spread: 8.60%



.9

# Plan C

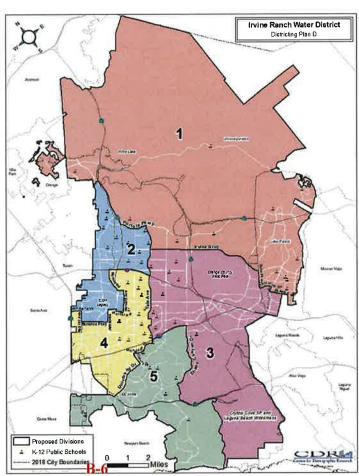
Plan C Percentage Spread: 6.89%



Irvine Ranch Water District

Plan D

Plan D Percentage Spread: 4.90%



# Plan A

Plan A
Percentage Spread:
3.19%

#### vine Ranch Water District- Plan A

Table 1. Population by Division and Rece/Ethnicity

	OVISION					
	1	2	3	4	- 5	Total
Total Population	67,229	66,316	67,365	68,468	67,773	337,151
Hispanic or Latino of any Race	7,092	13,223	7,809	6,058	6,143	40,325
Non-Hispanic White	31,151	39,670	27,294	34,423	38,659	171,197
Non-Hispanic Asian	25,013	9,693	27,673	23,253	19,143	104,775
Non-Hispanic Black or African-American	993	1,060	1,284	1,123	713	5,173
All Other Non-Hispanic Races/Ethnicities	2,980	2,670	3,305	3,611	3,115	15,681
Population 18 Years and Oktor	49,792	50,705	50,950	54,799	55,405	261,651
Hispanic or Latino of any Nage	4,857	5,993	5,422	4,428	4,831	28,531
Non-Hispanic White	24,432	31,702	21,987	28,806	31,836	138,763
Non-Hispanic Asian	18,245	7,661	20,748	18,347	16,061	81,062
Non-Hispanic Black or African-American	751	855	933	888	602	4,029
All Other Non-Hispanic Reces/Ethyleities	1,507	1,494	1,860	2,330	2,075	9,266
Citizen Voting Age Population (CVAP)	47,635	49,668	46,432	48,538	51,670	244,343
Hispanic or Latino of any Race	4,675	6,338	5,553	4,097	6,550	27,413
Non-Hispanic White	21,773	12,994	20,425	29,094	31,224	135,510
Non-Hispanic Aslan	18,195	7,835	17,550	13,355	11,796	68,731
Non-Hillpanic Black or African-American	1,093	1,061	1,224	950	452	4,810
All Other Non-Hispanic Races/Ethnicities	1,699	1,420	1,680	1,442	1,638	7,879

 Target Division Population
 67,430

 OM/slon Difference from Target Population
 -201
 -1,114
 -65
 1,038
 34

 Percent Difference from Target Population
 -0.30%
 -1.65%
 -0.10%
 1,54%
 0,51%

 Percent Difference from Target Population
 3,19%
 -1,55%
 -0.10%
 1,54%
 0,51%

Table 2. Share of Division Populations

	DIVISION					
	- 1	2	3	4	5	
Yetal Population	100,0%	100.0%	100.0%	100,0%	100.0%	
Hispanic or Letino of any flace	10.5%	19.9%	11.6%	8.8%	9.1%	
Non-Hispanic White	46,3%	59.8%	40.5%	50.3%	57.0%	
Non-Hapanic Asian	37.2%	14.6%	41.1%	34,0%	28.2N	
Non-Hispanic Black or African American	1.5%	1,6%	1.9%	1.6%	1.1%	
All Other Non-Hispanic Races/Estynicities	4,416	4.0%	4.9%	5.3%	4.6%	
Population 15 Years and Older	100.0%	100,0%	100.0%	100.0%	100,0%	
Hispanic or Latino of any Race	9,8%	17.7%	10.6%	8.1%	8.7%	
Non-Hispanic White	49.1%	62.5%	43,2%	52.6N	57.5N	
Non-Hapanic Asian	36.6%	15,1%	40.7%	33.5%	29.0%	
Non-Hispanic Black or African-American	1.5%	1.7%	1.8%	1.6%	1.19	
All Other Non-Hispanic Races/Estyricities	3.0%	2.9%	3,7%	4.3%	3.7%	
Citizen Voting Age Fogulation (CVAF)	100.0%	100.0%	100.0%	100.0%	100.0%	
Hispanic or Latino of any Race	10.2%	12.8%	12.0%	8.4%	12.7%	
Non-Hispanic White	45,7%	66.4%	44.0%	39.5%	60.4%	
Non-Hispanic Asian	38.2%	15.8%	37.8%	27.3%	22.5%	
Non-Hispanic Black or African-American	2.3%	2.2%	2.6%	1.9%	0.9%	
All Other Non-Hispanic Reces/Ethnicities	3,6%	2.9%	3.6%	2.9%	3.2%	

Irvine Ranch Water District

# Plan B

Plan B Percentage Spread: 8.60%

#### rvine Ranch Water District- Plan B

Table 1. Population by Division and Race/Ethnicky

the state of the s	DIVISION					
	- 1	1	3	4	3	Total
Total Population	67,094	68,886	65,550	64,912	70,709	337,151
Hispanic or Latino of any Race	7,047	13,468	7,409	6,362	6,039	40,325
Non-Hispanic White	30,783	41,003	27,634	30,375	41,402	171,197
Non-Hispanic Asian	25,335	10,51€	26,224	23,382	19,318	104,775
Non-Hispanic Black or African-American	962	1,114	1,143	1,245	709	5,173
All Other Non-Hispanic Races/Ethnicities	2,967	2,785	3,140	3,548	3,241	15,681
Population 18 Years and Older	49,410	52,502	49,516	52,774	57,149	261,651
Hispanic or Latino of any Race	4,792	9,192	5,143	4,685	4,719	28,531
Non-Hispanic White	23,934	32,846	22,260	25,748	33,975	139,763
Non-Hispanic Aslan	18,483	8,254	19.577	18,924	15,784	81,062
Non-Hapanic Black or African-American	725	900	815	992	597	4,029
All Other Non-Hispanic Reces/Ethnicities	1,476	1,570	1,721	2,425	2,074	9,266
Citizen Voting Age Population (CVAF)	44,561	52,099	47,595	45,874	53,214	244,343
Hispanic or Latino of any Race	4,486	6,512	5,471	4,898	6,046	27,413
Non-Hispariic White	20,375	34,244	21.111	26,098	33,682	135,510
Non-Hispanic Asian	17,041	8,661	18,035	13,387	11,587	68,731
Non-Hispanic Black or African-American	1,085	1,128	1,197	1,008	392	4,810
All Other Non-Hispanic Reces/Ethnicities	1,574	1,534	1,781	1,483	1,507	7,879

 Targat Division Population
 67,430

 Division Difference from Target Population
 -336
 1,456
 -1,880
 -2,518
 3,27

 Percent Difference from Target Population
 -0,50%
 2,16%
 -2,79%
 -3,73%
 4,860

 Percentage Spread
 8,60%

Table 2 Share of Olyhion Populations

Table 2: Share of Division Populations								
THE REAL PROPERTY OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COL	DIVISION							
	1	2	3	-4	.5			
Total Population	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Letino of any Race	10.5%	19.6%	11.3%	9.6%	8.5%			
Non-Hispanic White	45.9%	59.5%	42.2%	46.8%	58.6%			
Non-Hispanic Aslan	37.8%	15.3%	40.0%	36,0%	27.3%			
Non-Hispanic Black or African-American	2,4%	1,6%	1.7%	1,9%	1.0%			
All Other Non-Hispanic Reces/Ethnicities	4.4%	4.0%	4.8%	5.5%	4.6%			
Population III Years and Older	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic of Latino of any Race	9.7%	17,4%	10,4%	8.9%	8.3%			
Non-Hispanic White	45.4%	67.2%	45.0%	45.6%	59.4%			
Non-Hispanic Asian	37.4%	15,7%	39.5%	35.9%	27,6%			
Non-Hispanic Black or African-American	1.5%	1,7%	1.6%	1.9%	1.0%			
All Other Non-Hispanic Races/Ethnicities	3.0%	3.0%	3.5%	4.6%	3.6%			
Citizen Voting Age Population (CVAP)	100,0%	100,0%	100,0%	100.0%	100.0%			
Hispanic or Latino of any flace	10.1%	12.5%	11.5%	10.4%	11.4%			
Non-Hispanic White	45.7%	65.7%	44,4%	55.7%	63.3%			
Non-Hispanic Asian	38.2%	16,7%	37.9%	28.6%	21.8%			
Non-Hispanic Black or African-American	2.4%	2.2%	2.5%	2.2%	0.75			
All Other Non-Hispanic Races/Ethnicities	3.5%	2.9%	3.7%	3.2%	2.8%			

# Plan C

Plan C Percentage Spread: 6.89%

#### rvine Banch Water District-Plan C

Table 1. Population by Division and Bace/Ethnicky

	DIVISION					
	1	2	3	4	5	Total
Total Population	67,267	68,734	64,489	67,504	69,137	337,151
Hispanic or Latino of any Race	7,207	B,366	11,970	6,565	6,217	40,325
Non-Hispanic White	34,971	27,775	34,295	34,978	39,178	171.197
Non-Hispanic Asian	21,208	27,914	14,497	21,318	19,835	104,775
Non-Hispanic Black or African-American	882	1,285	1,065	1,217	724	5,173
All Other Non-Hispanic Races/Ethnicities	3,019	3,394	2,662	3,426	3,180	15,681
Fogulation 12 Years and Older	49,198	52,320	49,521	53,896	56,414	261,651
Hispanic or Latino of any Race	4,994	5,738	8,157	4,759	4,853	28,531
Non-Hispanic White	26,753	22,422	28,090	29,237	32,261	138,763
Non-Hispanic Aslan	15,298	21,233	11,188	16,792	16,551	81,062
Non-Hispanic Black or African-American	681	988	846	904	610	4,029
All Other Non-Hispanic Races/Ethnicities	1,472	1,939	1,540	2,206	2,109	9,766
Citizen Voting Age Population (CVAP)	49,766	45,063	47,919	49,264	52,331	244,343
Hispanic or Latino of any Race	4,740	5,511	5,614	4,905	6,640	27,413
Non-Hispanic White	25,854	19,822	29,236	29,019	31,579	135,510
Non-Hispanic Asian	16,698	16,710	10,470	12,856	11,997	68,731
Non-Hispanic Black or African-American	889	1,160	1,328	971	452	4,810
All Other Non-Hispanic Roces/Ethnicities	1,585	1,860	1,271	1,510	1,653	7,879

 Target Division Population
 67,430

 Division Difference from Target Population
 -143
 1,304
 -2,941
 74
 1,707

 Percent Difference from Target Population
 -0,21%
 1,934
 -4,36%
 0,11%
 2,53%

 Parget Population
 6,89%
 6,89%
 6,89%
 6,89%
 6,89%
 6,89%

Table 2. Share of Division Population

	DIVISION					
	- 1	2	3	4	5	
Total Population	100.0%	100.0%	100,0%	100.0%	100.0%	
Hispanic or Latino of any Race	10.7%	32.2%	15.6%	9.7%	9.0%	
Non-Hispanic White	52.0%	40,4%	53.2%	51.6%	56.7N	
Non-Hispanic Aslan	31.5%	40.6%	22.5%	31.6%	28.7%	
Non-Hispanic Black or African-American	1.3%	1,9%	1.7%	1.8%	1.0%	
All Other Non-Hispanic Races/Ethnicities	4.5%	4.9%	4.1%	5.1%	4.6%	
Population 18 Years and Older	100,0N	100,0%	100,0%	100.0%	100,0%	
Hispanic or Latino of any Race	10.2%	11,0%	16,4%	8.6%	5.7%	
Non-Hispanic White	34,4%	42.9%	56.4%	54.2%	57.2%	
Non-Hispanic Asian	31,1N	40,6%	22.5%	31.2%	29.3%	
Non-Hispanic Black or African-American	1.4%	1.9%	1.7%	1.7%	1.1%	
All Other Non-Hispanic Reces/Ethnicities	3.0%	3.7%	3.1%	4,1%	3.7%	
Citizen Voting Age Population (CVAP)	100.0%	100.0%	100.0%	100.0%	100.0%	
Hispanic or Latino of any Race	9.5%	12.2%	11.7%	.10.0%	12.7%	
Non-Hispanic White	57.0%	44.0%	61.0%	58.9%	60.3%	
Non-Hispanic Aslan	33.6%	37.1%	21.8%	76.1%	22.9%	
Non-Hispanic Black or African-American	1.8%	2.6%	2.8%	5.0%	0.9%	
All Other Non-Hispanic Races/Ethnicities	3.2%	4.1%	2.7%	3,1%	3.2%	

Irvine Ranch Water District

# Plan D

Plan D
Percentage Spread:
4.90%

#### rvine Ranch Water District- Plan D

Table 1. Population by Division and Race/Ethnicky

	DIVISION					
	1	2	3	4	- 5	Total
Total Population	68,657	67,602	65,350	67,537	68,005	337,151
Hispanic or Latino of any Race	12,543	7,853	7,213	6,607	6,109	40,325
Non-Hispanis White	41,197	28,932	30,824	30,538	39,706	171,197
Non-Hispanic Aslan	11,168	26,688	23,012	25,545	18,362	104,775
Non-Hispanic Black or African-American	1,026	1,045	1,682	1,310	710	5,173
All Other Non-Hispanic Races/Ethnicities	2,723	3,084	3,219	3,537	3,115	15,681
Population 18 Years and Older	51,839	49,715	50,426	53,280	56,391	261,651
Hispanic or Latino of any flace	8,542	5,793	5,073	4,749	4,874	28,531
Non-Hispenic White	32,446	22,525	25,379	25,332	33,081	138,763
Non-Hispanic Asian	8,565	19,542	17,249	19,971	15,735	81,063
Non-Hispanic Black or African American	811	774	834	1,009	601	4,025
All Other Non-Hispanic Races/Ethnicities	1,475	1,581	1,891	2,219	7,100	9.766
Citizen Voting Age Population (CVAP)	50,644	44,570	50,582	45,490	53,057	244,343
Hispanic or Latino of any Race	6,593	4,568	4,832	A,656	6,764	27,413
Non-Hispanic White	32,329	19,404	26,910	24,296	32,571	135,510
Non-Hispanic Asian	9,180	17,843	16.566	13,602	11,540	68,731
Non-Hispanic Black or African-American	967	1,124	1,084	1,173	462	4,510
All Other Non-Hispanic Recen/Ethnicities	1,575	1,631	1,190	1,763	1,720	7,879

 'arget Division Population
 67,430

 Vision Difference from Target Population
 1,227
 172
 -2,080
 107
 57!

 Version Liference from Target Population
 1,82%
 0,25%
 -3,08%
 0,16%
 0,859

 Version Liference from Target Population
 4,90%
 4,90%
 -2,080
 0,16%
 0,859

Table 2. Share of Division Populations

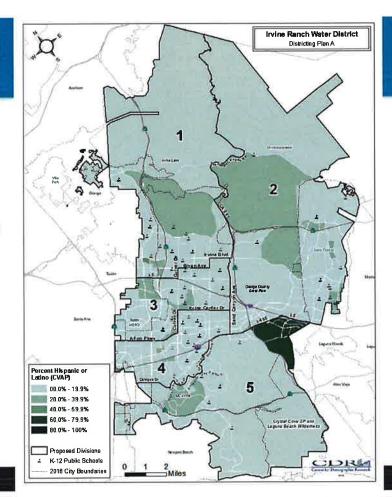
1 able 2. Share of Devision Populations							
	DIVISION						
	1	2	3	4	- 5		
Total Population	100.0%	100.0%	100.0%	100,0%	100.0%		
Hispanic or Latino of any Race	18.3%	11.6%	11.0%	9,8%	9.0%		
Non-Hispanic White	60.0%	42.8%	47.2%	45.2%	58,4%		
Non-Hispanic Asian	16.3%	39,5%	35.2%	37.8%	27.0%		
Non-Hispanic Black or Airlean-American	1.5%	1.5%	1.7%	1.9%	1.0%		
All Other Non-Hispanic Reces/Ethnicities	4.0%	4,6%	4.9%	5.2%	4.6%		
Population 15 Years and Older	100.0%	100.0%	100.0%	100.0%	100.0%		
Hispanic or Latino of any flace	16.5%	10.6%	10,1%	8,9%	8.6%		
Non-Hispanic White	62.6%	45.3%	50.3%	47.5%	59.7%		
Non-Hispanic Aslan	16.5%	39,3%	34.2%	37.5%	27,9%		
Non-Hispanic Black or African-American	1.6%	1,6%	1.7%	1.9%	1.176		
All Other Non-Hispanic Reces/Ethnicities	2.8%	3.2%	3.8%	4.2%	3.7%		
Citizen Voting Age Population (CVAP)	100.0%	100,0%	100.0%	100.0%	100.0%		
Hispanic or Latino of any Race	13,0%	10.2%	9.6%	10.2%	12.7%		
Non-Hispanic White	63.8%	43.5%	53.2%	53.4%	61.4%		
Non-Hispanic Aslan	18.1%	40.0%	32.8%	29.9%	21.8%		
Non-Hispanic Black or African-American	1.9%	2.5%	2.1%	2.6%	0.9%		
All Other Non-Hispanic Races/Ethnicities	3.1%	3.7%	2.4%	3.9%	3.2%		

# Plan A

Plan A
Percentage Spread:

3.19%

Largest Hispanic share of CVAP: 12.8%- Division 2 12.7%- Division 5



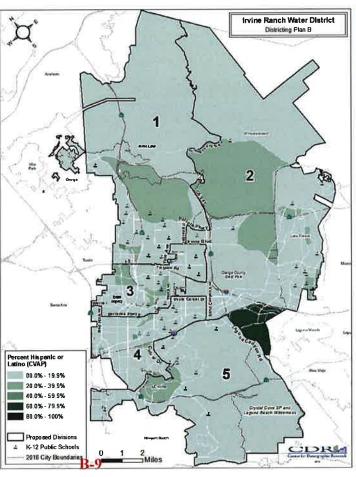
Irvine Ranch Water District

# Plan B

Plan B Percentage Spread:

8.60%

Largest Hispanic share of CVAP: 12.5%- Division 2 11.5%- Division 3

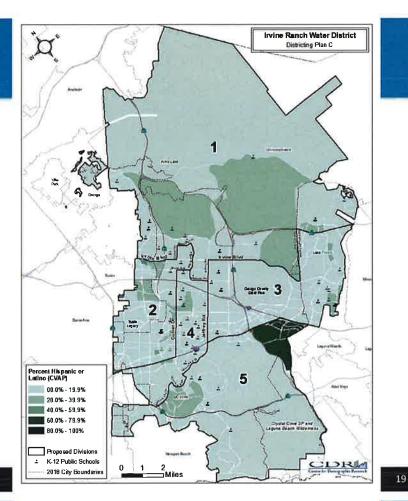


# Plan C

Plan C Percentage Spread:

6.89%

Largest Hispanic share of CVAP: 12.7%- Division 5 12.2%- Division 2



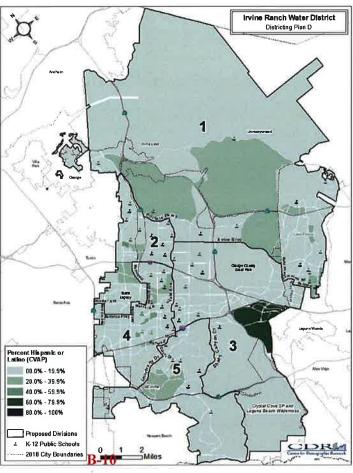
Irvine Ranch Water District

# Plan D

Plan D Percentage Spread:

4.90%

Largest Hispanic share of CVAP: 13.0%- Division 1 12.7%- Division 5



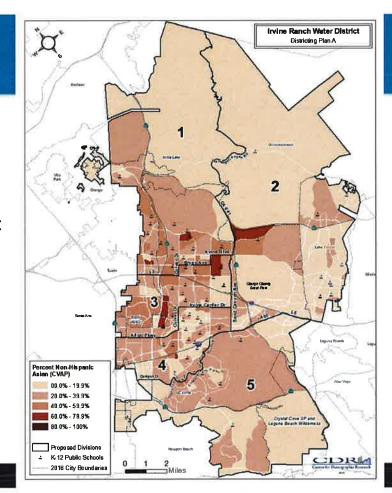
Irvine Ranch Water District

# Plan A

Plan A
Percentage Spread:

3.19%

Largest Non-Hispanic Asian share of CVAP: 38.2%- Division 1 37.8%- Division 3



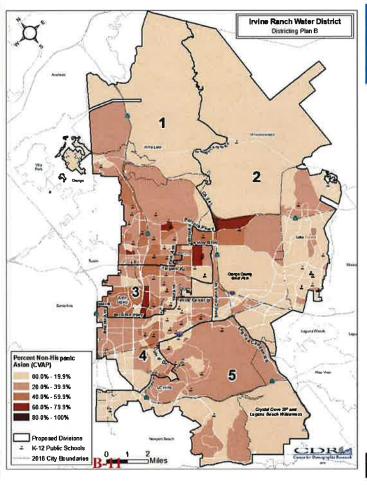
Irvine Ranch Water District

### Plan B

Plan B Percentage Spread:

8.60%

Largest Non-Hispanic Asian share of CVAP: 38.2%- Division 1 37.9%- Division 3



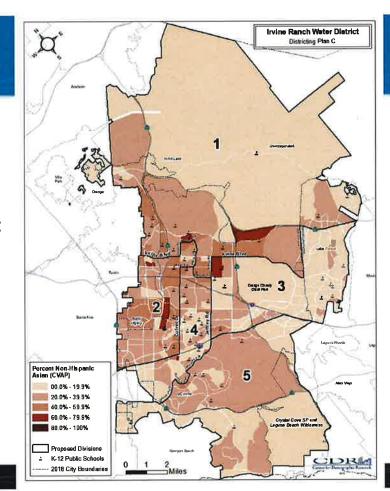
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# Plan C

Plan C Percentage Spread:

6.89%

Largest Non-Hispanic Asian share of CVAP: 37.1%- Division 2 33.6%- Division 1



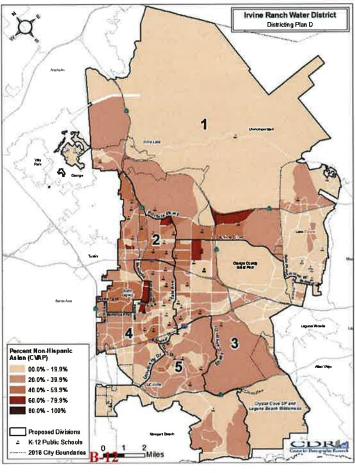
Irvine Ranch Water District

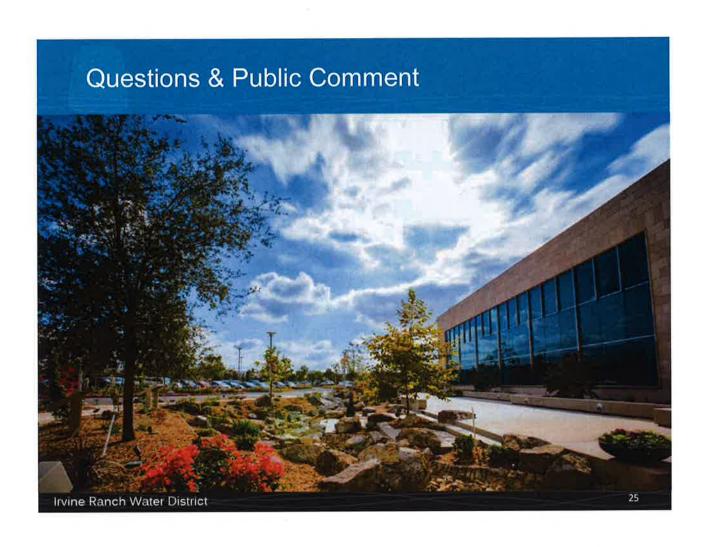
# Plan D

Plan D Percentage Spread:

4.90%

Largest Non-Hispanic Asian share of CVAP: 40.0%- Division 2 32.8%- Division 3

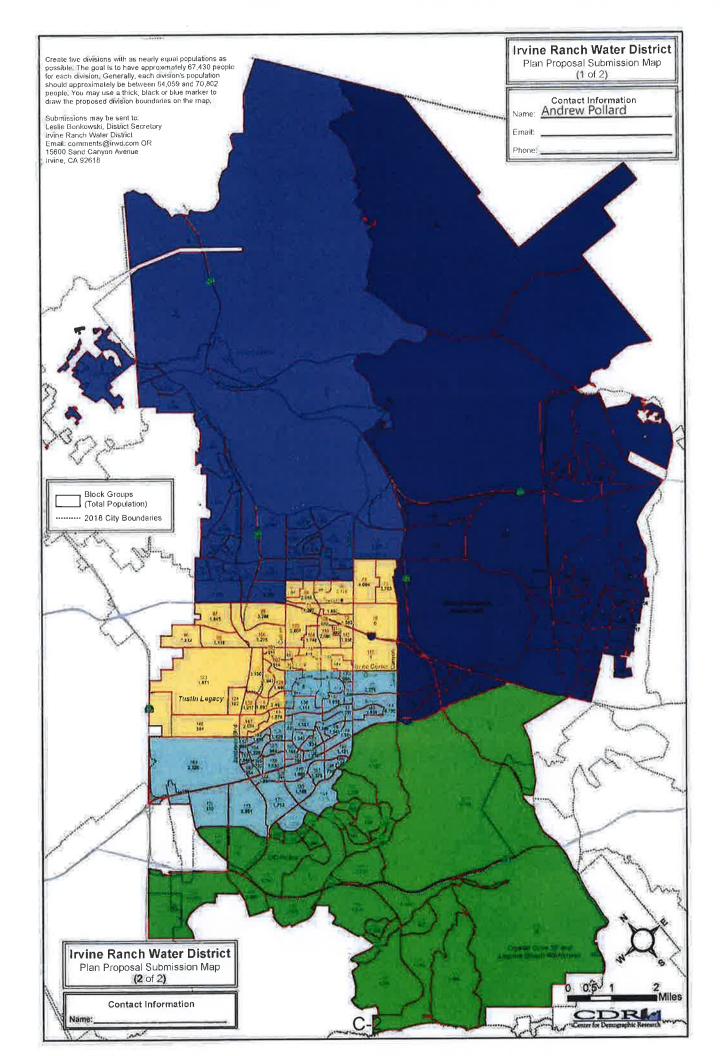




### EXHIBIT "C"

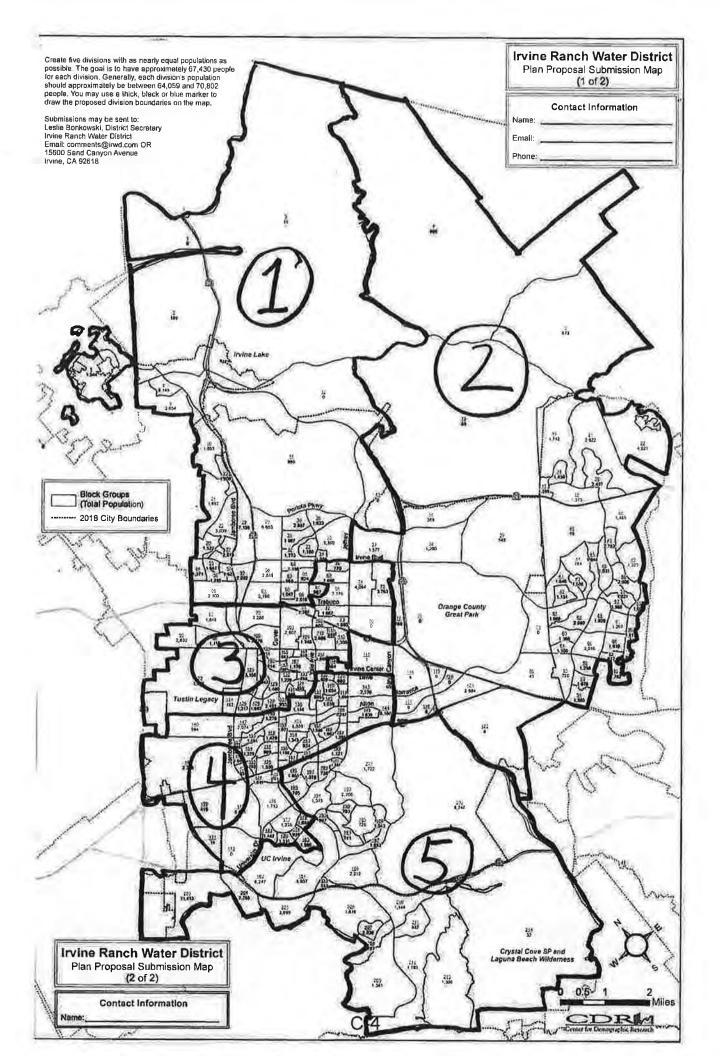
#### Public Comment Submitted to the Irvine Ranch Water District on the Composition of Possible Divisions August 15 – October 15, 2018

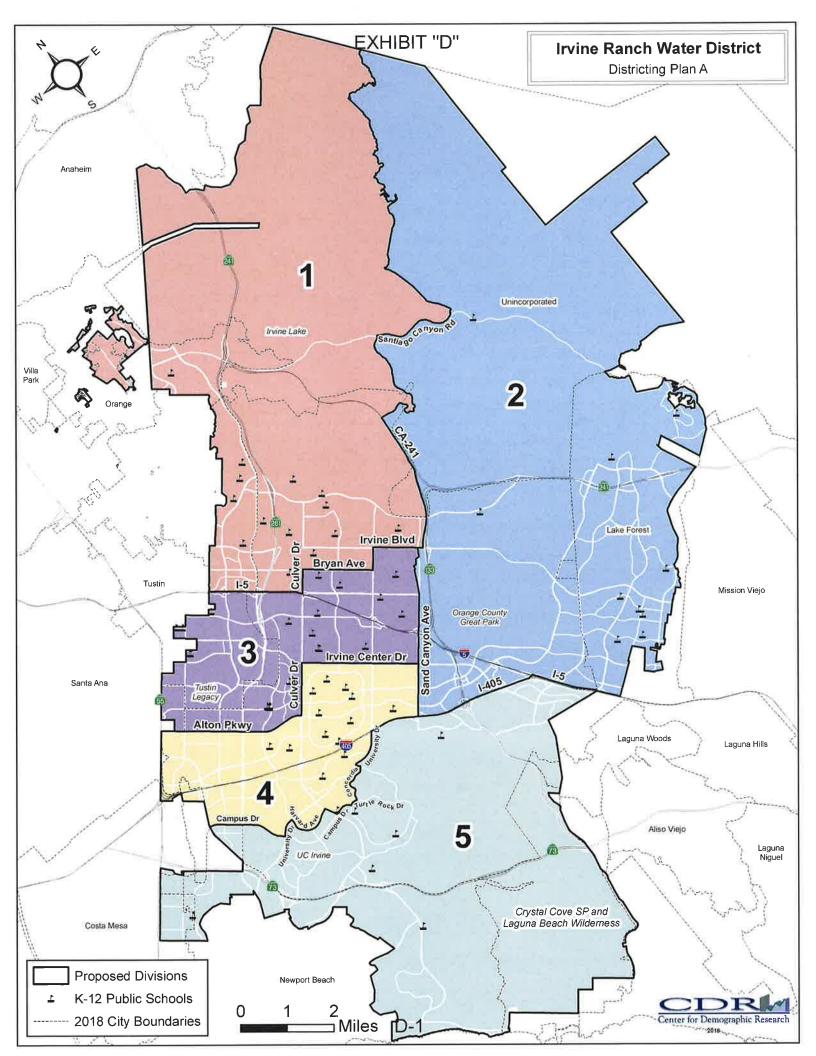
Author	Comment Submitted
Andrew Pollard	The proposed divisions were created as carefully as possible to minimize deviations from the target population amounts, while attempting to maintain well-established neighborhoods under a single director (Woodbridge, UC Irvine, Lake Forest, Tustin Ranch). Due to the nature of the population data, some neighborhoods had to be split between two directors to avoid an imbalance in the number of registered voters.
	From a geography perpsective, I attempted to divide the overall land area as much as possible so that a single director is not left with an oversized district, while others are responsible for more compact districts, as this could may potentially be viewed as an unfair advantage in an election. This is reflected in the division of the unincorporated area at the northeast end of the IRWD service area.
	Where possible, major streets and highways served as dividing lines between the various district areas. I attempted to keep the lines as clean and straight as possible, while minimizing the amount of zigzags. I figured that this would be beneficial to the overall compactness and simplicity of the map.
	Lastly, this proposed breakup of the IRWD service area is not submitted in support or against the proposed move to district elections.
	Thank you, Andrew Pollard



#### Public Comment Submitted to the Irvine Ranch Water District on the Composition of Possible Divisions August 15 – October 15, 2018

Author	Comment Submitted
Zeke Hernandez on behalf of California LULAC/Santa Ana LULAC Council #147	This districting plan provides an opportunity for a Latino candidate to be elected to the IRWD board because the northeast area of the District that has a strong Latino voting block is not splintered.





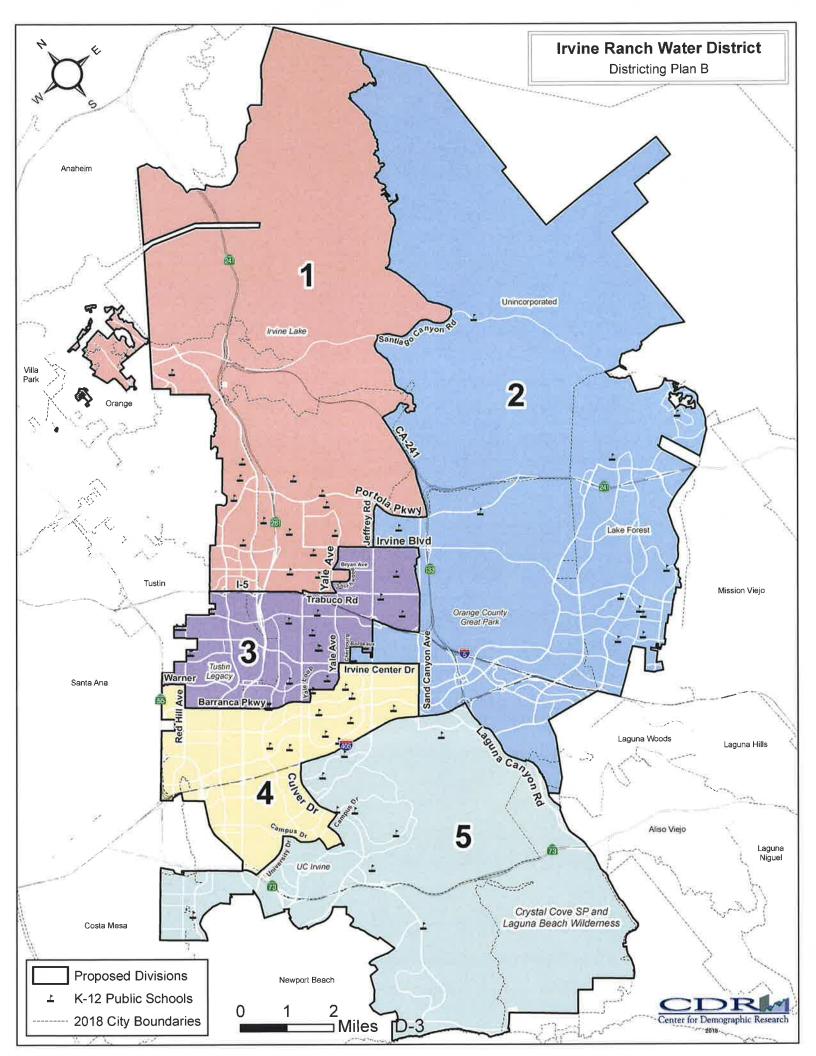
#### Irvine Ranch Water District- Plan A

Table 1. Population by Division and Race/Ethnicity

DIVISION				
5	Total			
67,773	337,151			
6,143	40,325			
38,659	171,197			
19,143	104,775			
713	5,173			
3,115	15,681			
55,405	261,651			
4,831	28,531			
31,836	138,763			
16,061	81,062			
602	4,029			
2,075	9,266			
51,670	244,343			
6,550	27,413			
31,224	135,510			
11,796	68,731			
462	4,810			
1,638	7,879			
343				
0.51%				
	51,670 6,550 31,224 11,796 462 1,638			

Table 2. Share of Division Populations

	DIVISION						
	1	2	3	4	5		
Total Population	100.0%	100.0%	100.0%	100.0%	100.0%		
Hispanic or Latino of any Race	10.5%	19.9%	11.6%	8.8%	9.1%		
Non-Hispanic White	46.3%	59.8%	40.5%	50.3%	57.0%		
Non-Hispanic Asian	37.2%	14.6%	41.1%	34.0%	28.2%		
Non-Hispanic Black or African-American	1.5%	1.6%	1.9%	1.6%	1.1%		
All Other Non-Hispanic Races/Ethnicities	4.4%	4.0%	4.9%	5.3%	4.6%		
Population 18 Years and Older	100.0%	100.0%	100.0%	100.0%	100.0%		
Hispanic or Latino of any Race	9.8%	17.7%	10.6%	8.1%	8.7%		
Non-Hispanic White	49.1%	62.5%	43.2%	52.6%	57.5%		
Non-Hispanic Asian	36.6%	15.1%	40.7%	33.5%	29.0%		
Non-Hispanic Black or African-American	1.5%	1.7%	1.8%	1.6%	1.1%		
All Other Non-Hispanic Races/Ethnicities	3.0%	2.9%	3.7%	4.3%	3.7%		
Citizen Voting Age Population (CVAP)	100.0%	100.0%	100.0%	100.0%	100.0%		
Hispanic or Latino of any Race	10.2%	12.8%	12.0%	8.4%	12.7%		
Non-Hispanic White	45.7%	66.4%	44.0%	59.5%	60.4%		
Non-Hispanic Asian	38.2%	15.8%	37.8%	27.3%	22.8%		
Non-Hispanic Black or African-American	2.3%	2.2%	2.6%	1.9%	0.9%		
All Other Non-Hispanic Races/Ethnicities	3.6%	2.9%	3.6%	2.9%	3.2%		



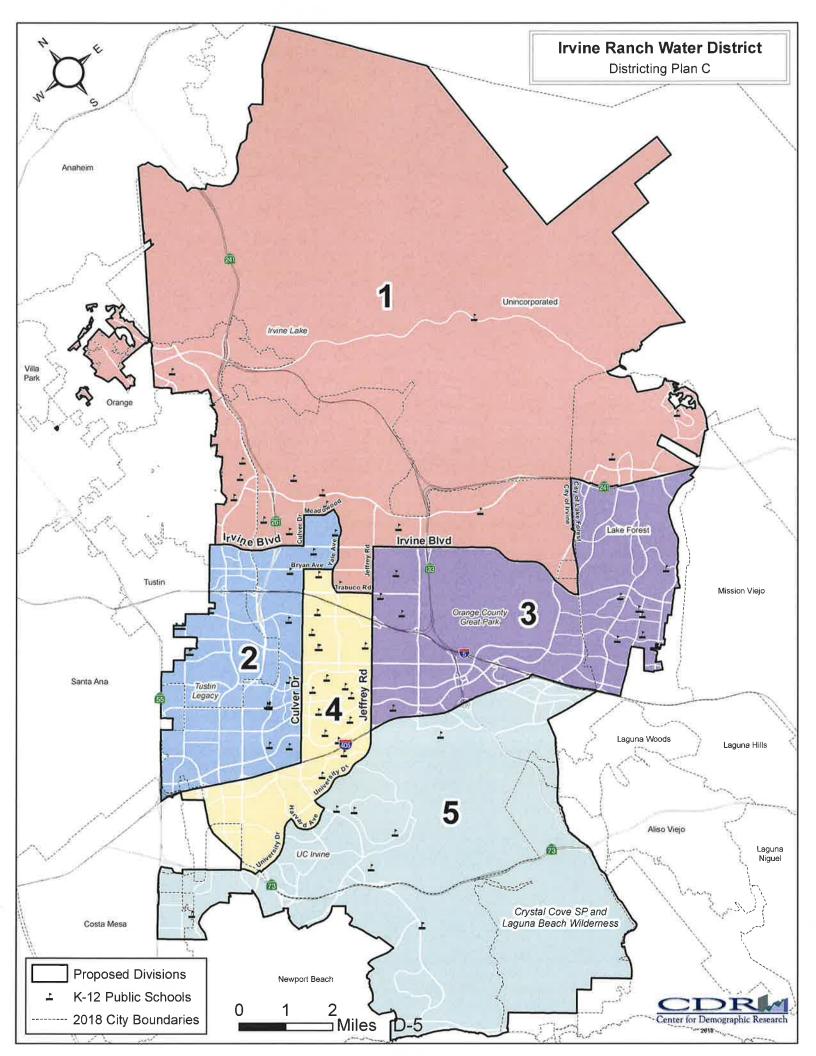
#### Irvine Ranch Water District- Plan B

Table 1. Population by Division and Race/Ethnicity

			DIVISION				
	1	2	3	4	5	Total	
Total Population	67,094	68,886	65,550	64,912	70,709	337,151	
Hispanic or Latino of any Race	7,047	13,468	7,409	6,362	6,039	40,325	
Non-Hispanic White	30,783	41,003	27,634	30,375	41,402	171,197	
Non-Hispanic Asian	25,335	10,516	26,224	23,382	19,318	104,775	
Non-Hispanic Black or African-American	962	1,114	1,143	1,245	709	5,173	
All Other Non-Hispanic Races/Ethnicities	2,967	2,785	3,140	3,548	3,241	15,681	
Population 18 Years and Older	49,410	52,802	49,516	52,774	57,149	261,651	
Hispanic or Latino of any Race	4,792	9,192	5,143	4,685	4,719	28,531	
Non-Hispanic White	23,934	32,846	22,260	25,748	33,975	138,763	
Non-Hispanic Asian	18,483	8,294	19,577	18,924	15,784	81,062	
Non-Hispanic Black or African-American	725	900	815	992	597	4,029	
All Other Non-Hispanic Races/Ethnicities	1,476	1,570	1,721	2,425	2,074	9,266	
Citizen Voting Age Population (CVAP)	44,561	52,099	47,595	46,874	53,214	244,343	
Hispanic or Latino of any Race	4,486	6,512	5,471	4,898	6,046	27,413	
Non-Hispanic White	20,375	34,244	21,111	26,098	33,682	135,510	
Non-Hispanic Asian	17,041	8,681	18,035	13,387	11,587	68,731	
Non-Hispanic Black or African-American	1,085	1,128	1,197	1,008	392	4,810	
All Other Non-Hispanic Races/Ethnicities	1,574	1,534	1,781	1,483	1,507	7,879	
Target Division Population	67,430						
Division Difference from Target Population	-336	1,456	-1,880	-2,518	3,279		
Percent Difference from Target Population	-0.50%	2.16%	-2.79%	-3.73%	4.86%		
Percentage Spread	8.60%						

Table 2. Share of Division Populations

	DIVISION							
	1	2	3	4	5			
Total Population	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	10.5%	19.6%	11.3%	9.8%	8.5%			
Non-Hispanic White	45.9%	59.5%	42.2%	46.8%	58.6%			
Non-Hispanic Asian	37.8%	15.3%	40.0%	36.0%	27.3%			
Non-Hispanic Black or African-American	1.4%	1.6%	1.7%	1.9%	1.0%			
All Other Non-Hispanic Races/Ethnicities	4.4%	4.0%	4.8%	5.5%	4.6%			
Population 18 Years and Older	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	9.7%	17.4%	10.4%	8.9%	8.3%			
Non-Hispanic White	48.4%	62.2%	45.0%	48.8%	59.4%			
Non-Hispanic Asian	37.4%	15.7%	39.5%	35.9%	27.6%			
Non-Hispanic Black or African-American	1.5%	1.7%	1.6%	1.9%	1.0%			
All Other Non-Hispanic Races/Ethnicities	3.0%	3.0%	3.5%	4.6%	3.6%			
Citizen Voting Age Population (CVAP)	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	10.1%	12.5%	11.5%	10.4%	11.4%			
Non-Hispanic White	45.7%	65.7%	44.4%	55.7%	63.3%			
Non-Hispanic Asian	38.2%	16.7%	37.9%	28.6%	21.8%			
Non-Hispanic Black or African-American	2.4%	2.2%	2.5%	2.2%	0.7%			
All Other Non-Hispanic Races/Ethnicities	3.5%	2.9%	3.7%	3.2%	2.8%			



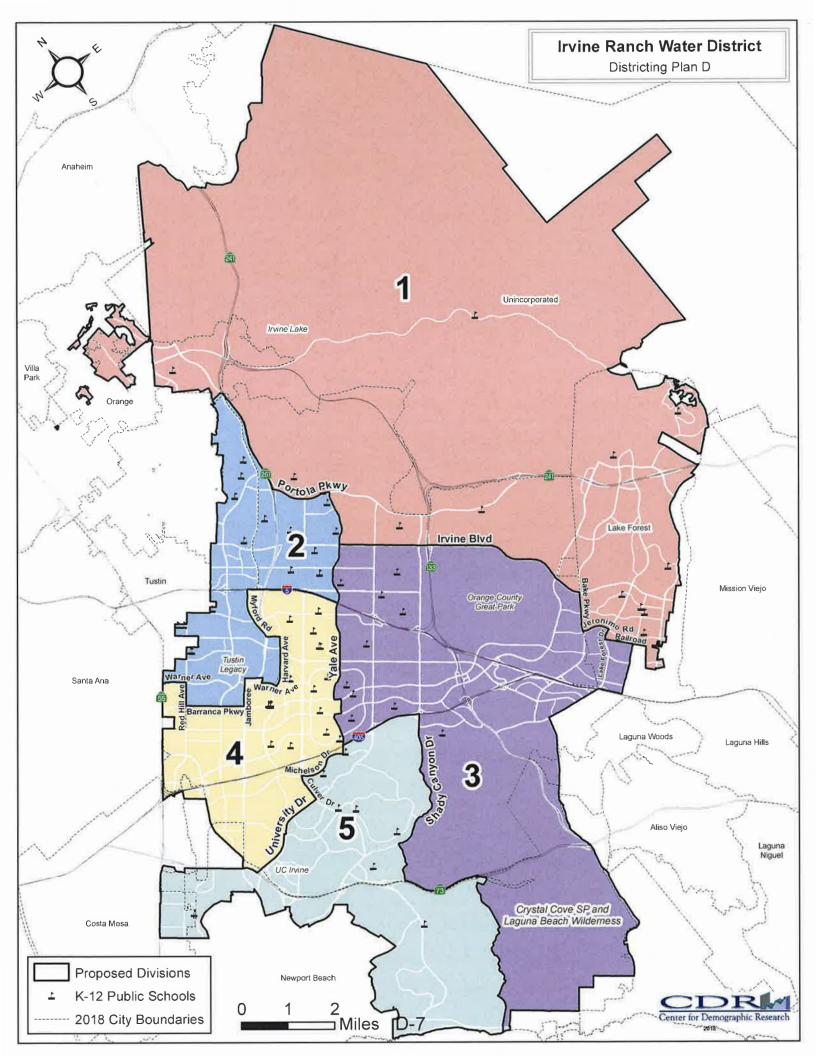
#### Irvine Ranch Water District- Plan C

Table 1. Population by Division and Race/Ethnicity

	DIVISION					
	1	2	3	4	5	Total
Total Population	67,287	68,734	64,489	67,504	69,137	337,151
Hispanic or Latino of any Race	7,207	8,366	11,970	6,565	6,217	40,325
Non-Hispanic White	34,971	27,775	34,295	34,978	39,178	171,197
Non-Hispanic Asian	21,208	27,914	14,497	21,318	19,838	104,775
Non-Hispanic Black or African-American	882	1,285	1,065	1,217	724	5,173
All Other Non-Hispanic Races/Ethnicities	3,019	3,394	2,662	3,426	3,180	15,681
Population 18 Years and Older	49,198	52,320	49,821	53,898	56,414	261,651
Hispanic or Latino of any Race	4,994	5,738	8,157	4,759	4,883	28,531
Non-Hispanic White	26,753	22,422	28,090	29,237	32,261	138,763
Non-Hispanic Asian	15,298	21,233	11,188	16,792	16,551	81,062
Non-Hispanic Black or African-American	681	988	846	904	610	4,029
All Other Non-Hispanic Races/Ethnicities	1,472	1,939	1,540	2,206	2,109	9,266
Citizen Voting Age Population (CVAP)	49,766	45,063	47,919	49,264	52,331	244,343
Hispanic or Latino of any Race	4,740	5,511	5,614	4,908	6,640	27,413
Non-Hispanic White	25,854	19,822	29,236	29,019	31,579	135,510
Non-Hispanic Asian	16,698	16,710	10,470	12,856	11,997	68,731
Non-Hispanic Black or African-American	889	1,160	1,328	971	462	4,810
All Other Non-Hispanic Races/Ethnicities	1,585	1,860	1,271	1,510	1,653	7,879
Target Division Population	67,430					
Division Difference from Target Population	-143	1,304	-2,941	74	1,707	
Percent Difference from Target Population	-0.21%	1.93%	-4.36%	0.11%	2.53%	
Percentage Spread	6.89%					

Table 2. Share of Division Populations

	DIVISION							
	1	2	3	4	5			
Total Population	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	10.7%	12.2%	18.6%	9.7%	9.0%			
Non-Hispanic White	52.0%	40.4%	53.2%	51.8%	56.7%			
Non-Hispanic Asian	31.5%	40.6%	22.5%	31.6%	28.7%			
Non-Hispanic Black or African-American	1.3%	1.9%	1.7%	1.8%	1.0%			
All Other Non-Hispanic Races/Ethnicities	4.5%	4.9%	4.1%	5.1%	4.6%			
Population 18 Years and Older	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	10.2%	11.0%	16.4%	8.8%	8.7%			
Non-Hispanic White	54.4%	42.9%	56.4%	54.2%	57.2%			
Non-Hispanic Asian	31.1%	40.6%	22.5%	31.2%	29.3%			
Non-Hispanic Black or African-American	1.4%	1.9%	1.7%	1.7%	1.1%			
All Other Non-Hispanic Races/Ethnicities	3.0%	3.7%	3.1%	4.1%	3.7%			
Citizen Voting Age Population (CVAP)	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	9.5%	12.2%	11.7%	10.0%	12.7%			
Non-Hispanic White	52.0%	44.0%	61.0%	58.9%	60.3%			
Non-Hispanic Asian	33.6%	37.1%	21.8%	26.1%	22.9%			
Non-Hispanic Black or African-American	1.8%	2.6%	2.8%	2.0%	0.9%			
All Other Non-Hispanic Races/Ethnicities	3.2%	4.1%	2.7%	3.1%	3.2%			



#### Irvine Ranch Water District- Plan D

Table 1. Population by Division and Race/Ethnicity

			DIVISION			
	1	2	3	4	5	Total
Total Population	68,657	67,602	65,350	67,537	68,005	337,151
Hispanic or Latino of any Race	12,543	7,853	7,213	6,607	6,109	40,325
Non-Hispanic White	41,197	28,932	30,824	30,538	39,706	171,197
Non-Hispanic Asian	11,168	26,688	23,012	25,545	18,362	104,775
Non-Hispanic Black or African-American	1,026	1,045	1,082	1,310	710	5,173
All Other Non-Hispanic Races/Ethnicities	2,723	3,084	3,219	3,537	3,118	15,681
Population 18 Years and Older	51,839	49,715	50,426	53,280	56,391	261,651
Hispanic or Latino of any Race	8,542	5,293	5,073	4,749	4,874	28,531
Non-Hispanic White	32,446	22,525	25,379	25,332	33,081	138,763
Non-Hispanic Asian	8,565	19,542	17,249	19,971	15,735	81,062
Non-Hispanic Black or African-American	811	774	834	1,009	601	4,029
All Other Non-Hispanic Races/Ethnicities	1,475	1,581	1,891	2,219	2,100	9,266
Citizen Voting Age Population (CVAP)	50,644	44,570	50,582	45,490	53,057	244,343
Hispanic or Latino of any Race	6,593	4,568	4,832	4,656	6,764	27,413
Non-Hispanic White	32,329	19,404	26,910	24,296	32,571	135,510
Non-Hispanic Asian	9,180	17,843	16,566	13,602	11,540	68,731
Non-Hispanic Black or African-American	967	1,124	1,084	1,173	462	4,810
All Other Non-Hispanic Races/Ethnicities	1,575	1,631	1,190	1,763	1,720	7,879
Target Division Population	67,430					
Division Difference from Target Population	1,227	172	-2,080	107	575	
Percent Difference from Target Population	1.82%	0.25%	-3.08%	0.16%	0.85%	
Percentage Spread	4.90%					

Table 2. Share of Division Populations

	DIVISION							
	1	2	3	4	5			
Total Population	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	18.3%	11.6%	11.0%	9.8%	9.0%			
Non-Hispanic White	60.0%	42.8%	47.2%	45.2%	58.4%			
Non-Hispanic Asian	16.3%	39.5%	35.2%	37.8%	27.0%			
Non-Hispanic Black or African-American	1.5%	1.5%	1.7%	1.9%	1.0%			
All Other Non-Hispanic Races/Ethnicities	4.0%	4.6%	4.9%	5.2%	4.6%			
Population 18 Years and Older	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	16.5%	10.6%	10.1%	8.9%	8.6%			
Non-Hispanic White	62.6%	45.3%	50.3%	47.5%	58.7%			
Non-Hispanic Asian	16.5%	39.3%	34.2%	37.5%	27.9%			
Non-Hispanic Black or African-American	1.6%	1.6%	1.7%	1.9%	1.1%			
All Other Non-Hispanic Races/Ethnicities	2.8%	3.2%	3.8%	4.2%	3.7%			
Citizen Voting Age Population (CVAP)	100.0%	100.0%	100.0%	100.0%	100.0%			
Hispanic or Latino of any Race	13.0%	10.2%	9.6%	10.2%	12.7%			
Non-Hispanic White	63.8%	43.5%	53.2%	53.4%	61.4%			
Non-Hispanic Asian	18.1%	40.0%	32.8%	29.9%	21.8%			
Non-Hispanic Black or African-American	1.9%	2.5%	2.1%	2.6%	0.9%			
All Other Non-Hispanic Races/Ethnicities	3.1%	3.7%	2.4%	3.9%	3.2%			