I write to object to the ICRC's 9/28 preliminary maps.

1. The ICRC Must Give the Public a Written Explanation of Which 10-One Charter Amendment Criteria the ICRC Relied on to Arrive at These Boundaries.

The factors the ICRC uses to draw boundaries include only the criteria Austin voters included in the 10-One charter amendment. As noble as their wishes may be, individual ICRC members inserting purely personal wishes into the 10-One process damage its integrity. As noble as any goal may be, members aiming to achieve a personal desire not reflected in the charter disrespect the broad consensus hundreds of thousands of Austin voters reached in favor of their own personal agenda..

For example, by not including the Mueller development in District One, the ICRC apparently succumbed to a couple of District One residents who complained that they didn't want "newbies" in their district. But the charter doesn't include as a criterion "I don't like the people who just moved in across the street from me." Mueller residents travel the same roads as District One residents. They go to the same parks. They shop at the same stores. They go to the same restaurants. They worship in the same churches. What criterion justifies splitting Mueller from the folks across the road from them? Certainly not inter-neighborhood peevishness.

This is the largest transparency issue the ICRC faces. The integrity of the 10-One process is at stake. If the ICRC can't give a written explanation assuring the public the ICRC used the charter criteria--and <u>only</u> the charter criteria--to draw districts, then the ICRC is taking the chance the whole 10-One process will suffer a crisis of public confidence.

2. A District Should Cross the Colorado River and I35 Only if it's the Only "Possible" Way to Comply with the Voting Rights Act.

Whether we like it or not, the Colorado River and I35 largely define Austin's "communities of interest." However, seven of the ICRC's districts do not honor these boundaries. The ICRC has also disregarded other longstanding "community of interest" boundaries, such as East 7th Street. The charter criteria allow the splitting of "communities of interest" only if it is the only way "possible" to comply with federal and state law, mainly the VRA. Again, as noble as a goal may be, if it splits a "community of interest" it's legal only if it's impossible to do otherwise and still comply with fed/state law. The ICRC owes the public a written explanation of how its districts comply with the charter criteria, specifically with regard to not honoring the many geographic boundaries that define Austin's "communities of interest."

3. South Central Map Previously Presented to the ICRC.

The proposed South Central District map I presented to the ICRC (attached) is not on the ICRC's web site. Please post it on the web site. Its comprises the Austin Neighborhoods Council's Sector 7 and Austin's iconic "78704" community of interest. There is no affinity between this area and areas north of the river. In contrast, 78704 and the COI across MOPAC share proximity to Zilker Park and Barton Springs, and

rely on MOPAC for mobility. as well as share an affinity with the precincts to the west.

Let me know if you have questions or would like to discuss.

Regards, Tom