



August 23, 2021

TO: Members and Staff of the Colorado Independent Redistricting Commissions

FROM: Colorado Farm Bureau

SUBJECT: Comments on existing Congressional map and submission of proposed legislative maps

We thank you and your staff for the excellent work to redraw Colorado's Congressional and Legislative maps. You have a challenging job. The members of the Colorado Farm Bureau and I commend you for your effort and commitment. Please accept these comments and the attached proposed legislative maps on behalf of the more than 24,000 members of the Colorado Farm Bureau across the state.

The Colorado Farm Bureau has represented the interests of the state's farmers, ranchers, and rural communities for more than 100 years. We work to promote, protect and enhance Colorado agriculture and the rural communities the industry both supports and relies on.

We are all Coloradans with a shared sense of community and love for our state, but it is important to recognize that rural Colorado is distinct. It's different from urban and suburban areas for the way it uses land, its sparse population, its transportation and infrastructure needs, and its agricultural and natural resource-based economy. Rural Colorado is also culturally distinct from the state's urban and suburban corridor along the Front Range.

Voters who reside in rural regions focused on agriculture have very different needs than their urban neighbors regarding representation within Congress and the state legislature. Because agriculture is so unique, most mainstream public policy solutions often impact the industry in unexpected and typically negative ways.

What works on a factory floor or in an office building rarely works on a farm or ranch. Policies seemingly targeted towards a specific industry can dramatically impact agriculture because of the industry's dependence on other segments of the value and supply chain. Because they sell commodities, farmers and ranchers are price takers. Laws or regulations that increase the cost of doing business impact agriculture disproportionately because producers cannot pass along those increases to consumers.

Only 1 percent of the population is directly involved in production agriculture. As a result, the vast majority of the nation's population is several generations removed from the farm or ranch. This creates a broader disconnect between the wider population and the people that make up the industry that feeds it. This separation from the farm and ranch means that 99 percent of the population does not understand how agriculture can be impacted by monetary policy, employment regulations, federal nutrition programs,





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environmental laws, international trade, land-use policies, wildlife management, public lands administration, banking regulations, transportation infrastructure, tax policy, public and higher education, accounting standards, wireless and broadband construction, national monument designations, the Endangered Species Act, oil and natural gas production, and even congressional and legislative redistricting, just to name a few. This is just a short list of a much larger panoply of policy areas that impact agriculture. These stark differences often require 'specialist' legislators who understand this and can help mitigate it.

Because of their small size and focus on agriculture, rural communities often live and die with the fortunes of the agriculture industry. Conversely, agriculture producers are reliant on these small communities as key service providers. Without rural banks, equipment dealers, grocers, auto shops, restaurants, health clinics, and other vital services, farming, ranching, and everyday life activities can become more expensive and difficult if not impossible to conduct.

As a result, it is essential for district boundaries to take this into account and provide for robust and distinct rural representation.

Congressional Map

Because rural Colorado is a distinct community of interest, **we applaud you for maintaining two rural districts in your initial Congressional map.** This map recognizes the unique character of rural Colorado and the dilution of political representation that would occur should urban, and suburban areas be drawn into predominantly rural districts. Rural Colorado needs strong representation by Congresspersons interested in our unique communities, and maintaining two rural districts will provide that.

We would also raise the following areas for your consideration on the Congressional map:

- An area of particular note is where the more urban and suburban parts of Douglas County have been included in CD 6 and 7. We support this. We understand and have heard the concerns of residents of the Town of Parker about their city being split into three districts. We believe that as much of Parker as possible should be kept **out** of the 4th CD. To partially offset the population of Parker, the southwestern parts of Douglas county could be included in the 4th CD.
- To achieve the required population, we recognize the need to include more densely populated urban and suburban areas into the two rural districts. We support the inclusion of Greeley and Pueblo into the 4th CD and Grand Junction, Montrose, Steamboat Springs, etc., into the 3rd CD. Both Greeley and Pueblo are cities closely tied to the agriculture industry and the people who work there.
 - Greeley was founded as an agricultural commune and still relies on agriculture for the bulk of its employment and economic growth. **Weld county is the 8th largest agricultural county in the nation, and Greeley is a critical node in the ag industry there and**





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across the state. It plays host to essential parts of the state's agricultural value chain, including beef and dairy processing, cattle feeding, and agricultural research and finance, to name a few.

- Pueblo is also a community steeped in agricultural history and a major part of the promotion of Colorado agriculture. Pueblo chile is now an endemic brand tied to the community and the agriculture industry. The Colorado State Fair is hosted in Pueblo and is critical to the state's agriculture industry and rural social makeup. Additionally, the city is closely connected with the larger Lower Arkansas River Valley, nationally known for its produce production.
- In the 3rd CD, Grand Junction, Montrose, Steamboat Springs, and other cities are all not only historically tied to the agriculture industry but remain so today. In fact, many of these communities help drive the growth of their tourism industry by trading on their ag sector. In these communities, which span from the north to the south, the two sectors are closely intertwined and have similar interests. These cities are also shaped by their proximity to federal lands managed by the BLM and the U.S. Forest Service, which is a vital issue for the more rural areas of the 3rd CD and the agriculture industry in the region.
- The map also improves current congressional district boundaries by moving the San Luis Valley and its surrounding areas into the 4th CD.
 - The San Luis Valley's large-scale intensive irrigated agriculture sector and focus on crop production are much more similar to agriculture production on the Eastern Plains than the smaller-scale, and niche crop production found on the Western Slope. Additionally, the vast majority of commodities grown in the SLV are shipped to markets to the east and south.
 - The region shares more of the challenges found to the east than to the west regarding water. Issues along the Colorado River basin will continue to drive the conversation on water in the 3rd CD. The San Luis Valley has almost no nexus with that specific water issue. However, river basins to the east in the 4th CD have all had previous curtailments resulting from compact commitments and will face ongoing pressure from municipalities in a way that is markedly different from the rest of the Western Slope. Furthermore, the San Luis Valley, like the rest of the 4th CD, has virtually no issues arising from the presence of the federal Bureau of Reclamation, in marked contrast to the rest of the 3rd CD where interaction with the agency is frequent and a significant part of the policy discussion on water issues.
 - Improving transportation access for elected officials will also help constituent services. The SLV is easily accessed from the East, over one lower-elevation mountain pass, but is challenging to access from the North or West. Voters in the San Luis Valley will interact more frequently with Congresspersons representing the 4th CD.





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- Drawing the SLV into the 4th CD also helps to combine the concerns of the historic Latino population tied to agriculture with similar population groups along the Lower Arkansas Valley and in Weld County. This allows those populations to speak with a larger and more equal voice in the district, better supporting their interactions with USDA and other federal agencies.

The Colorado Farm Bureau also strongly supports maintaining an East/West split amongst the state's rural Congressional districts. The state's congressional districts have been divided between east and west for nearly forty years precisely because it is the most obvious way to divide the state and its distinct populations.

- This division is supported by the obvious geography of Colorado, which informs the character of the communities on either side of the continental divide, their economy, their social makeup, and their needs pertaining to federal representation.
- As the state's two rural districts, the 3rd, and the 4th Congressional Districts share a common economic and social base, but the Rocky Mountains inform distinct differences in the ag industry that necessitates the individual representation that is not provided by a North/South split.
 - Agriculture production on the Western Slope vs. the Eastern Plains is markedly different, with differing markets, cropping mixes, livestock production systems, and irrigation methods.
 - Water resources and the issues that drive water policy are significantly different. Combining east and west in a single district would have a significant negative impact on the ability of a single representative to be an effective advocate for the needs on both sides of the mountains.
- The West Slope is also dominated by the nexus between private and public lands, an issue that barely registers on the Eastern Plains. The 3rd CD requires a Congressperson who will become a specialist on federal lands policy. A North/South split would dramatically dilute the effectiveness of representation on federal lands issues on the Western Slope. Issues surrounding the Colorado River watershed also will be a massive part of the discussion in the coming years. With more issues arising out of the Colorado River Compact, it would be prudent not to split the Colorado River and include it with other watersheds with significantly different issues, i.e., South Platte, Arkansas. This issue is barely relevant to the San Luis Valley, let alone the rest of the communities in the 4th CD.

Legislative Maps

The Colorado Farm Bureau commends the Commission and staff on the initial legislative redistricting maps, but our organization feels they can be improved in several areas. In an effort to advance the conversation and





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assist the Commission in its work, our staff has created draft maps for both Senate and House districts based on updated 2020 census data.

Both maps were created in the spirit of Amendments Y and Z, with the criteria for drawing districts as our primary goal. Both maps focus heavily on keeping communities of interest whole and balancing racial makeup. Commissioners will also notice we focused heavily on respecting county and municipal integrity. Only four counties across both maps (Delta, Montezuma, Eagle, and Garfield) could be mathematically kept whole but are split. Where those splits are made, it is done to maintain communities of interest.

With limited exceptions, districts in multi-district counties are kept within the boundaries of that county. Both maps are within a 4.95 percent variance, below the 5 percent allowed by law.

House

The CFB House map creates three districts on the Eastern Plains that are more compact than those in the Commission’s preliminary map. Of note is HD 64, which keeps the entire Lower Arkansas Valley whole and is almost 33 percent Hispanic. On the Western Slope, the Roaring Fork Valley is left whole, and the map also creates a strong southwest Colorado district per testimony to the Commission.

Overall, the CFB House map includes 16 districts that are at least 30 percent Hispanic or are majority-minority:

- HD 1 50.6% Hispanic
- HD 4 44.5% Hispanic
- HD 7 82.3% minority (48.7% Hispanic / 26.0% Black)
- HD 8 50.8% minority (25.4% Hispanic / 19.1% Black)
- HD 17 57.1% minority (34.0% Hispanic / 16.6% Black)
- HD 30 52.3% Hispanic
- HD 32 52.0% Hispanic
- HD 34 56.7% Hispanic
- HD 35 50.1% minority (38.7% Hispanic)
- HD 41 50.9% minority (19.7% Hispanic / 21.5% Black)
- HD 42 65.9% minority (33.3% Hispanic / 24.6% Black)
- HD 46 40.9% Hispanic
- HD 50 58.3% minority (49.5% Hispanic)
- HD 56 35.0% Hispanic
- HD 62 50.0% Hispanic
- HD 64 32.9% Hispanic

Competitiveness is also a priority for our organization, as rural voices have difficulty ensuring adequate representation compared to even small municipalities due to the relative population density.





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Our map contains 15 competitive districts as measured against the 2018 Colorado Attorney General race results, with a variance of no more than 8.5 points. These districts are:

- HD 3 49.3% D / 48.6% R
- HD 18 46.8% D / 49.4% R
- HD 21 49.0% D / 46.9% R
- HD 26 50.9% D / 45.2% R
- HD 27 50.4% D / 46.0% R
- HD 28 50.4% D / 46.4% R
- HD 29 50.7% D / 45.8% R
- HD 31 48.4% D / 47.9% R
- HD 36 50.2% D / 46.3% R
- HD 37 50.8% D / 46.5% R
- HD 40 49.7% D / 47.3% R
- HD 46 51.7% D / 44.7% R
- HD 50 48.7% D / 46.5% R
- HD 56 45.8% D / 50.0% R
- HD 59 49.6% D / 47.2% R

Senate

The CFB Senate map creates more compact district boundaries on the Western Slope. Like the House map, it maintains Montezuma, La Plata, and Archuleta counties in the same district along with the remainder of Southwest Colorado, per public testimony regarding that community of interest. We keep a strong southern Colorado district, merging the shared interests of the San Luis Valley and Southeastern Colorado together, similar to the current state Senate district. This configuration has served the region well in the last decade. Importantly though, our map keeps Pueblo county whole as District 3, with a 41.6 percent Hispanic population and competitive to within 3.3 points.

Overall the CFB Senate map includes 10 districts that are at least 30 percent minority or minority-majority. This is one additional district as compared to the 2011 map and includes:

- SD 2 32.0% Hispanic
- SD 3 41.6% Hispanic
- SD 11 51.0% minority (29.3% Hispanic / 14.7% Black)
- SD 13 41.6% Hispanic
- SD 21 64.3% minority (54.4% Hispanic)
- SD 25 52.3% minority (39.8% Hispanic)
- SD 29 66.5% minority (34.4% Hispanic / 24.2% Black)
- SD 33 64.9% minority (35.1% Hispanic / 22.5% Black)
- SD 34 38.8% Hispanic
- SD 35 30.1% Hispanic

Using the same standard as the House map, the CFB Senate map boasts 11 competitive districts, including:





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- SD 2 49.7% D / 46.4% R
- SD 3 49.8% D / 46.5% R
- SD 5 50.1% D / 46.4% R
- SD 8 49.8% D / 47.1% R
- SD 11 48.0% D / 46.7% R
- SD 12 46.2% D / 50.2% R
- SD 15 44.5% D / 52.1% R
- SD 16 45.1% D / 51.8% R
- SD 19 49.8% D / 46.8% R
- SD 26 52.3% D / 44.9% R
- SD 27 50.1% D / 47.2% R

Colorado Farm Bureau’s maps were created using the Daves Districting online platform¹ and can be accessed here:

House: <https://davesredistricting.org/join/f0bdd525-1383-4fec-922c-cd4e05208e50>

Senate: <https://davesredistricting.org/join/741a47a5-0b5c-4427-845f-894f5ab6ef9e>

For questions regarding these maps or CFB’s process, please contact our Vice President of Advocacy, Shawn Martini, at Shawn@ColoradoFB.org

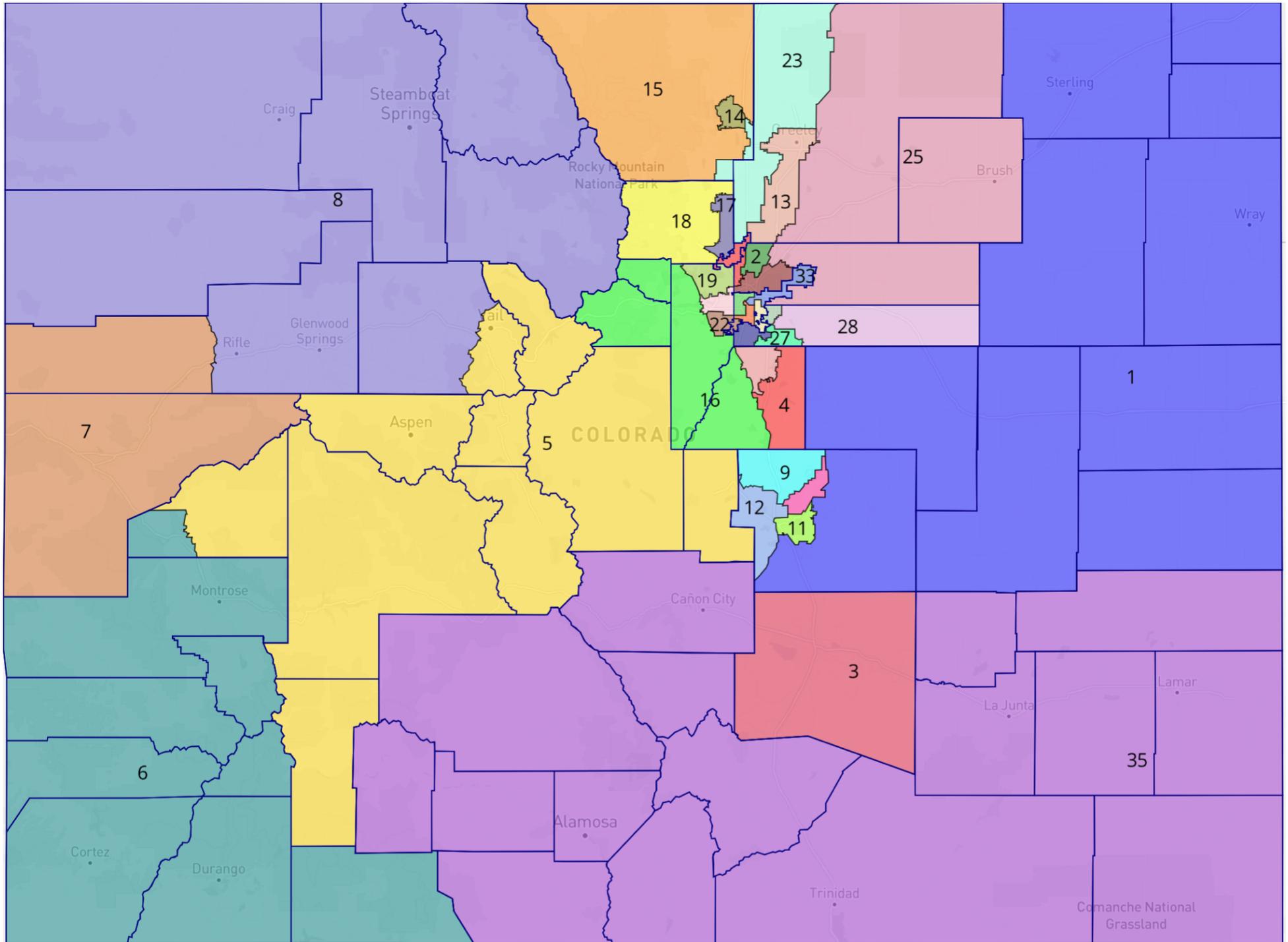
Respectfully submitted,

Carlyle Currier
President

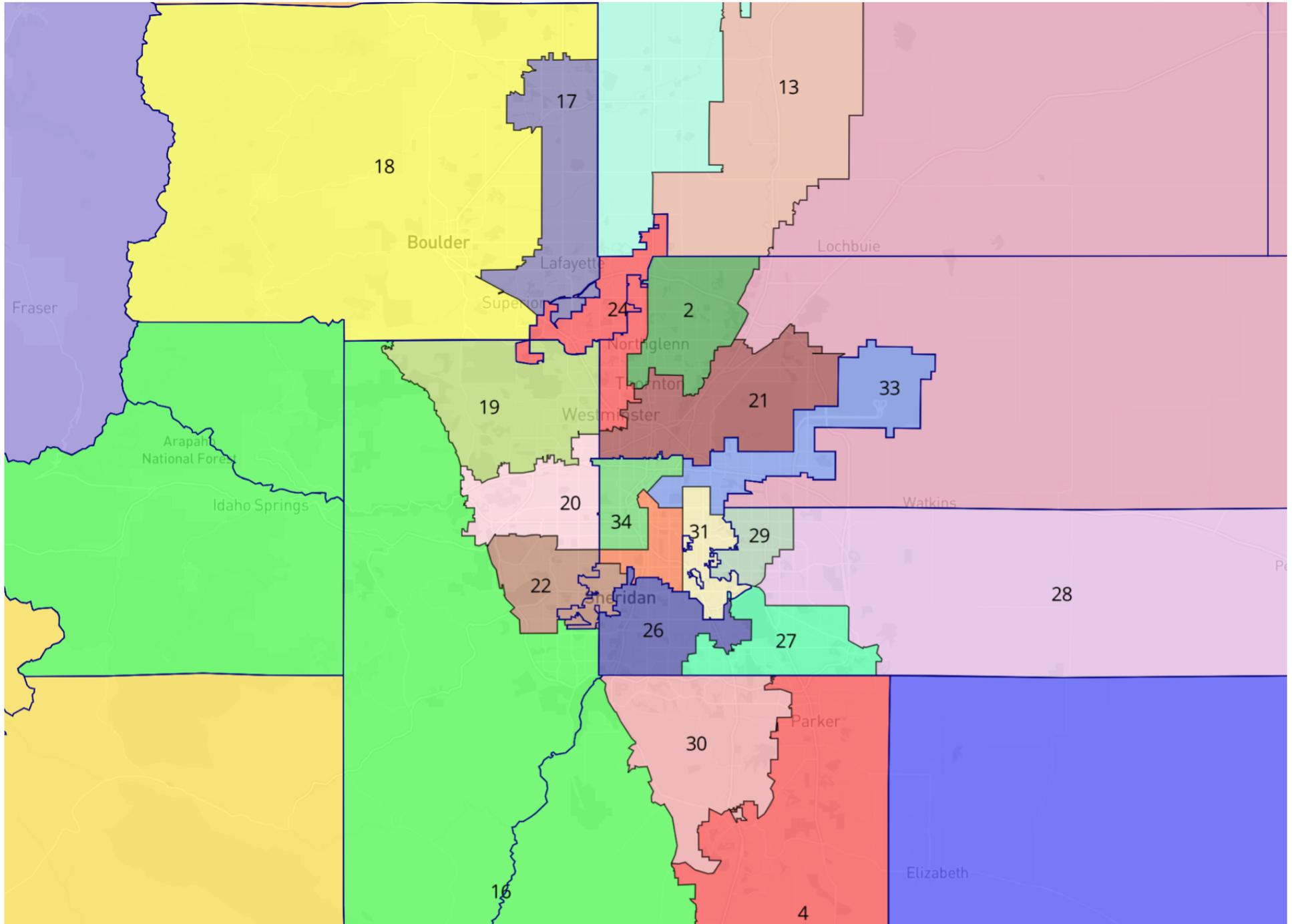
¹ CFB’s maps were created by our professional staff, at the request of our Executive Committee. To maintain impartiality, those committee members and other State Board members, including Commissioner Hass, played no part in the creation of the CFB maps.



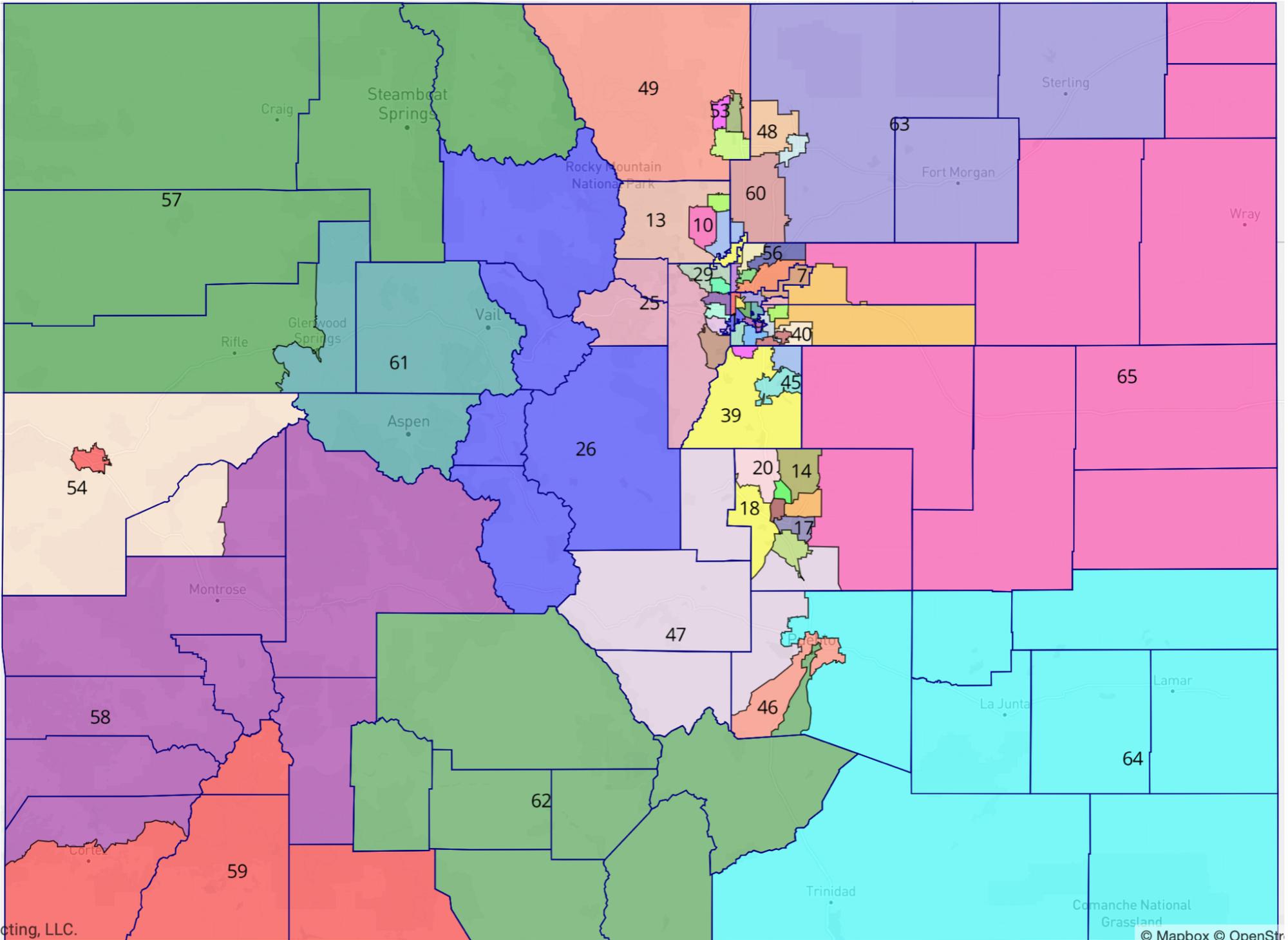
Colorado Farm Bureau- Colorado Senate Map



Colorado Farm Bureau- Colorado Senate Map- Denver Detail



Colorado Farm Bureau- Colorado House Map



Colorado Farm Bureau- Colorado House Map- Denver Detail

