



September 17, 2021

**TO:** Members of the Colorado Independent Legislative Redistricting Commissions

**FROM:** Colorado Farm Bureau

**SUBJECT:** Comments and updated submission of proposed legislative maps

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Thank you again for your excellent work on the current legislative map proposals. 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.

First, we'd like to thank you for your vote to acknowledge agricultural communities and rural Colorado as a community of interest. That recognition should drive the creation of rural districts for both maps. To that end, we were disappointed with the First Staff Plan in a few key areas:

- **Senate**

- We feel that Eastern Colorado is underrepresented with what is essentially a single Senate seat in District 3. That same region is included in three seats in the initial map we presented to the Commission and in the attached "CFB Updated" Senate map<sup>1</sup>.
- Senate District 2 is another problem area in the First Staff Plan. The district is not compact and draws together several very different communities and counties.
- We feel that a Senate district that combines the San Luis Valley with the eastern part of southern Colorado as in the current configuration of SD 35 is preferable to District 7 in the First Staff Plan. We explored the reasons for this position in our previous comments. But in brief, both the region's geography and economic ties lend the San Luis Valley to an eastward facing district, more than a westward one.
- We oppose including Clear Creek County in District 8. This does a disservice to the unique needs of the communities in that county. Notably, the inclusion also dilutes the district's agricultural community of interest by including a county that lies within the Denver-Aurora-Lakewood Metropolitan Statistical Area.
- The division between District 8 and District 5 is troublesome and could be made more compact. We would suggest an orientation more similar to District 5, 6, and 7 in our updated attached Senate map.

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<sup>1</sup> <https://davesredistricting.org/join/567da258-3803-46e9-84f7-5ecc80f9d8f7>





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- **House**

- We appreciate the inclusion of two representatives on the Eastern Plains, but we think more can be done to improve the boundaries of District 65. The district is currently very dispersed and includes very mismatched counties and communities. While the First Staff Plan map improves the current configuration, we think a better approach is found in our CFB Updated House map<sup>2</sup>. This configuration also creates a third Eastern Plains district and better recognizes the differences in the makeup of the Eastern Plains region.
- Garfield and Pitkin County's pairing in District 57 is a non-starter due to the dramatic differences in the two counties. This is a region where the Preliminary Map is significantly better than the First Staff Plan. We understand the Commission has voted to recognize the area as a community of interest. We would recommend a split in Garfield county, allowing the Valley to remain in a single district and generally recognize the differences between the two counties. We provide a solution in Districts 57 and 61 in our CFB Updated House map.

Overall we feel that with some changes, the Preliminary maps provide a better roadmap for the Commission to move forward with than the First Staff Plan. In the Preliminary map, district boundaries tend to fall along lines that make more sense and have a sensitivity to the differences and eccentricities of the state. It also has the advantage of being a more competitive configuration, which our members feel should be a strong priority. Competitiveness should also be considered a place where new maps can vastly improve over the current legislative boundaries in the state.

As you and your staff look to balance the concerns outlined here, we again offer our draft updated maps as a potential solution. The revised maps differ from the initial set of maps we submitted last month in several ways:

- The maps are updated to reflect the Commission's decision to reallocate prisoner populations to their home address. This required only minor changes to a handful of district boundaries.
- We have changed the configuration of Senate Districts 23 and 25 that better align northern Weld County with the rest of similar agricultural regions in the rest of the county, per feedback from our members in the area.
- The House map now included both eastern Adams and Arapahoe counties in District 65 in response to member feedback and testimony before the Commission. The Senate map includes eastern Arapahoe in a similar configuration.
- Sedgwick county has moved to House District 63 to maintain almost the entire length of the agricultural stretches of the South Platte River within the same district.

As with our previous versions, our updated maps maintain an edge over the Preliminary maps in competitiveness and minority representation.

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<sup>2</sup> <https://davesredistricting.org/join/26873c9a-746d-4e7a-8722-8cf428472ebd>





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Thank you again for your careful consideration of our feedback and ideas. We value the ability to participate and are focused on providing comments that help move the process forward.

Colorado Farm Bureau's maps were created using the Daves Districting online platform<sup>3</sup> and can be accessed here:

House: <https://davesredistricting.org/join/26873c9a-746d-4e7a-8722-8cf428472ebd>

Senate: <https://davesredistricting.org/join/567da258-3803-46e9-84f7-5ece80f9d8f7>

For questions regarding these maps, please contact our Vice President of Advocacy, Shawn Martini, at [Shawn@ColoradoFB.org](mailto:Shawn@ColoradoFB.org)

Respectfully submitted,

A handwritten signature in cursive script that reads "Carlyle Currier".

Carlyle Currier  
President

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<sup>3</sup> 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.

