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**Re:** No. R-20-0035, Petition to Amend the Procedures for Nominations for the Independent Redistricting Commission

This comment is submitted to record the opposition of All On The Line-Arizona to the permanent rule changes affecting the Commission on Appellate Court Appointments, which are proposed in the above-referenced petition. This matter is particularly pressing as the Commission on Appellate Court Appointments prepares to nominate candidates to the Arizona Independent Redistricting Commission (IRC).

All On The Line-Arizona is dedicated to restoring fairness to our democracy and ensuring that everyone has an equal say in our government. Our work is driven by Arizonans who are invested in increasing transparency and public engagement in the redistricting process and working against the polarization and dysfunction of our political system.

Twenty years ago, Arizona voters chose an independent redistricting commission to help prevent gerrymandering and secure fair maps. Since that time, Arizonans have remained deeply engaged in the redistricting process. Countless Arizonans have shown up for public hearings, submitted draft maps, or applied to serve on this critical commission throughout the last two redistricting cycles.

An open and transparent application process is fundamental to achieving a robust and fair redistricting process and to upholding public confidence in redistricting -- criteria that the redistricting commissioners themselves are required to uphold upon their appointment. As the Rules being amended specifically point out, public confidence in the integrity of the redistricting process is a central goal of the Commission on Appellate Court Appointments' nomination process. But the proposed changes to those same rules work *against* that stated goal.

Most concerningly, the ability of individuals and organizations to submit private comments on these applicants opens the Commission on Appellate Court Appointments to undue influence. Allowing private comments also undermines public trust in the process. There must be transparent input on the individuals who will shape the next ten years of Arizona history. The rule change even goes so far as to allow the identity of the individual or entity submitting a comment to be confidential, leaving the Arizona public

unaware of who is influencing the Commission on Appellate Court Appointments regarding these applicants.

Additionally, the petition includes language that decreases the number of commissioners required to conduct official business and decreases the number of commissioners required to enter executive session, shielding their deliberations from the public. These are particularly alarming changes as the Commission undertakes the process of nominating IRC commissioners with a currently incomplete Commission on Appellate Court Appointments. Shrinking the number of commissioners required for decision-making on this already incomplete, partially vacant commission is anti-democratic and politicizes a commission that should be dedicated to independence and fairness.

We oppose efforts to decrease transparency in Arizona's redistricting process. These steps to curb transparency are deeply troubling and undermine the key principles of a public-driven and independent redistricting process. We ask the Court *not* to permanently adopt this rule change, but rather to protect the public's trust by maintaining an independent, transparent, and fair process for applying to serve on the Independent Redistricting Commission.