



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE

June 28, 2021

Via Hand-Delivery and E-Mail

The Honorable Mark A. Nordenberg, Chair
The Honorable Kim Ward
The Honorable Kerry Benninghoff
The Honorable Jay Costa
The Honorable Joanna McClinton

Legislative Reapportionment Commission
c/o Legislative Data Processing Center
Senate Box 64, Main Capitol Building
Harrisburg, PA 17120

Re: Important Deadlines for 2022 Election Cycle

Dear Members of the Legislative Reapportionment Commission:

As the Legislative Reapportionment Commission (“LRC”) begins its work, I believe it would be helpful to advise you and the other members of the LRC about several important election-related administration deadlines related to the 2022 election cycle. Although the 2022 General Primary will be held on May 17, 2022, the primary election cycle begins in earnest much earlier than the day of the primary election. Candidates may begin to circulate and file nomination petitions as early as February 15, 2022 but may file no later than March 8, 2022. To circulate nomination petitions, candidates and voters must know the district boundary lines for legislative districts. This is essential since candidates running for legislative office may only solicit signatures on nomination petitions from registered voters within their legislative district. Thus, once the legislative reapportionment plan is final, the county boards of elections must quickly assign voters to their correct legislative districts in the Statewide Uniform Registry of Electors (“SURE”) to facilitate the signature gathering process. These SURE tasks are time-intensive and require the highest degree of accuracy. Historically, county boards of election have needed at least *three weeks before the start of nomination petition filing* to complete these tasks in the SURE system and distribute nomination forms to prospective candidates and their volunteers. For these reasons, it would be ideal for the Department to receive an approved final legislative reapportionment plan that has the force of law no later than January 24, 2022. This timeframe would help the counties reduce errors, allow for timely notice to candidates, and permit proper implementation of the new legislative districts by the 2022 primary election.

I am mindful that the work of the LRC for this redistricting cycle is impacted by the U.S. Census Bureau’s (“Census Bureau”) announcement that it will not deliver the Public Law 94-171 redistricting data in a tabulated format to the states until September 30, 2021 a significant departure

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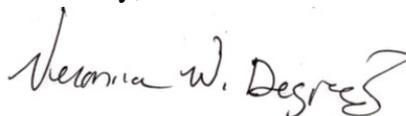
from previous decennial Census operational timeline. Despite this delay, it is my understanding that the Census Bureau *will provide a legacy format* summary redistricting data file to all states by mid-to-late August 2021. Although the raw data may be less user-friendly, I would urge the LRC to consider employing resources with the skills and capacity to tabulate this raw data ahead of the September 30th release of the tabulated data. Perhaps the addition of even just a few extra weeks would help the LRC achieve the greatest success in an already condensed legislative reapportionment process.

Although I do not want to presuppose the eventual outcome of the LRC's redistricting work, every final legislative reapportionment plan has been appealed to the Pennsylvania Supreme Court since the LRC process was established by the Pennsylvania Constitutional Convention in 1967-1968 and ratified by voters in 1968. Further, if a final plan does come before the Pennsylvania Supreme Court, I am hopeful that any appeal will receive an expedited review and adjudication by the Court. I am sure that you will agree that in order to afford the Court sufficient time to hear any appeals and ultimately determine whether the final plan shall have the force of law, such that it can be used for the 2022 General Primary, the LRC will need to work as expeditious as possible. It will be essential for the LRC to effectively shorten any time periods within its control.

I completely grasp that the LRC's work has been delayed through no fault of its own; and I expect that you also appreciate the importance of the timelines set forth above. I know there is a significant amount of work to be done, and that transparency and public participation must be factored into the legislative reapportionment process. I can assure you my staff stands ready and willing to assist the LRC in any way possible. The Department will be prepared to quickly process the information from the preliminary and final reapportionment plans for publication in newspapers throughout the Commonwealth and educate candidates and voters via its website. To that end, it would be extremely helpful if the LRC provided the Department, at the time of filing, the corresponding shape files for both the preliminary and final reapportionment plans. Further, the Department would also request the election district (precinct) shapefiles and the census block shapefiles relied upon by the LRC in creating the plans.

Thank you for your time and leadership in this crucial process to ensure fair and equal representation in the Pennsylvania General Assembly for all citizens of the Commonwealth. Please feel free to contact me should you have any questions.

Sincerely,



Veronica W. Degraffenreid
Acting Secretary of the Commonwealth

cc: G. Reynolds Clark (by hand delivery and email)
Robert Beyer (by hand delivery and email)