The Redistricting Commission Report sent to the County Council violates the Commission's original terms for its actions because the Report "cracks" a "community of interest" (COI) in a "compact" area. Specifically, the Report splits up the Orthodox Jewish community in the Kemp Mill section of Silver Spring.

The following paragraphs explain the community, identify the problem, identify the impact, note some process issues, and request a remedy from the Council.

The Community: The Kemp Mill Orthodox Jewish Community (KMOJC) of about 3500 constitutes a "community of interest" as defined by the Supreme Court and the court cases cited by the Commission.

- Socially, the KMOJC encompasses a tightly knit COI with shared religious beliefs and practices, and shared concerns. The community has several synagogues and schools within walking distance of each other which have interlinked memberships and which cooperate closely.
- Geographically, the Kemp Mill Orthodox Jewish Community (KMOJC) is a "compact" area including Kemp Mill Estates, Kemp Mill Farms, Kemp Mill Forest/Springbrook Forest, and the area across Arcola Ave. from Kemp Mill Estates bounded by University Blvd. on the south and by Sligo Creek Park and Wheaton Regional Park on the west. It is currently in District 4.
- KMOJC members consciously share social concerns and needs for government services that transcend membership in specific synagogues or schools, as well as members' economic circumstances. (Community members are not insular, by the way, and, for example, stand side-by-side with non-Jewish Kemp Mill community members in preparing distributing free food at the Antioch Reformed Christian Church on Arcola Ave. in response to COVID.)

Problem: The Commission split the KMOJC between proposed Districts 5 and 6. The area bounded by Arcola Ave, Sligo Creek Park, and University Blvd is in proposed District 6. It includes hundreds of KMOJC members, including young families, singles, and seniors who live in apartments, condos, townhouses, and single-family homes and two major institutions - a synagogue and the Yeshivah College of the Nation's Capital. The rest of the KMOJC is in proposed District 5 and has mostly single-family homes, several synagogues and some schools.

Impact: Previously, the KMOJC could speak with one voice to a single County Council member to address County Government and related services issues. The proposed change would complicate the efforts of the community and its religious leaders to address problems and needs and would dilute their voices in addressing issues that cross the proposed District boundaries.

Process Issues: It should be noted that members of the KMOJC are active in the Kemp Mill Civic Association (KMCA), and the Commission did not consult with the KMCA prior

to release of the Report. Also, in reviewing the Agendas, Meeting Minutes, and related materials posted on the Commission's web site, I did not see any draft maps or other representations that gave any warning of the Commission's intent. I do not know whether the "cracking" was intentional or not, but it should be recognized for what it is and be remedied.

In view of these concerns, I request that the County Council either directly amend the Commission's boundaries or send the Report back to the Commission for it to adjust the boundaries to rectify the cracking of the KMOJC COI, amend boundaries elsewhere to compensate, and to consult with the affected communities of interest. Thank you for your assistance in resolving this matter.

Howard Kern