

Exhibit 2

Declaration of John A. Safarli in Support of City's Reply

Glatt v. City of Pasco, et al.

No. 4:16-CV-05108-LRS

SECOND SUPPLEMENTAL REPORT OF PETER A. MORRISON, Ph.D.

Glatt v. City of Pasco, et al.

No. 4:16-CV-05108-LRS

School District Boundaries

1. In Paragraph 4 of the Supplemental Declaration of William S. Cooper (dated November 1, 2016), Mr. Cooper disputes my claim that “the City’s 2016 boundaries appear to be closely coextensive with the boundaries of the Pasco School District.” He states that the Pasco city boundaries are “not ‘closely coextensive’” with Pasco School District. This semantic difference—“closely coextensive” vs. “not ‘closely coextensive’”—is a red herring and rings hollow.
2. To the eye, city and school district boundaries are not visually coextensive, since the latter encompasses large swaths of sparsely settled territory outside Pasco’s city limits. Functionally, though, they are closely coextensive, in that the City’s total population (62,452, according to Cooper) comprises 92% of the school district’s population (68,155). Close to all of the people (although not all the acreage) in City are, in fact, within the school district.

Methodological Differences

3. In Paragraph 8 of Mr. Cooper’s Supplemental Declaration, he raises the first substantive issue: “Dr. Morrison uses a different method to disaggregate block group-level CVAP data to census blocks than my method. But the bottom line CVAP percentage differences between the two methods for Pasco by district and citywide are not significant.”
4. My method does indeed differ from Mr. Cooper’s, and for an important reason: His methodology is not consistent with standard demographic practice when using sample data. It does not follow demographic “best practices” (as dictated by US Census Bureau practice) as mine does. In prior testimony, I have exposed important inconsistencies in Mr. Cooper’s primitive method, which undermine my confidence in its results.¹

¹ See: SUPPLEMENTAL EXPERT REPORT OF PETER MORRISON, Ph.D. in *Montes v. City of Yakima*, U.S. District Ct., Eastern District of WA, at paragraphs #1 - #4 and #13. Online at:

Population Projection

5. In Paragraph 10, Mr. Cooper states: “Dr. Morrison has not provided details on how he projected 43% for the 2021 Pasco LCVAP . . .”
6. Here are the details, along with validation of method to date. I use straightforward cohort progression, starting with 2010 data (see Table 1 below). The column labelled “2021” shows 42.6% Hispanic projected for 2021. The “2015” column shows 37.7% Hispanic projected for 2015. This projected 37.7% compares favorably with the actual 38.5% published value (shown in the right-hand column labelled “2015 Actual”), recorded on the 2015 American Community Survey. This favorable comparison to date validates my cohort projection method as a forecast. Excel file available upon request.

Table 1. Projected Hispanic Share of CVAP in 2021 and 2015 Validation of Method

City of Pasco								
Hispanics' Share of 2010 Citizen Population (2008-12 ACS est.)		Hispanics' Projected Share of Citizen Population 18+ Midyear 2013-2021						
Population Base	No.	2013	2014	2015	2017	2019	2021	2015 Actual
Citizen Population (2008-12)								
Citizens 18+:	27,551	30,847	31,946	33,045	35,242	37,440	39,637	34,083
Hispanics	8,782	10,987	11,722	12,457	13,927	15,397	16,867	13,132
NonHispanics	18,769	19,860	20,224	20,588	21,315	22,043	22,770	20,951
%Hispanic	31.9%	35.6%	36.7%	37.7%	39.5%	41.1%	42.6%	38.5%
Citizens under 18:	19,777	+3/18	+4/18	+5/18	+7/18	+9/18	+11/18	
Hispanics	13,230							
NonHispanics	6,547							
%Hispanic	66.9%							
Sources: US Census Bureau, 2008-2012 and 2013 American Community Survey, Tables B05003, B05003L.								

https://www.academia.edu/29811660/Supplemental_Report_of_Peter_A._Morrison_Ph.D

7. In Paragraph 12, Mr. Cooper opines that “[I]t is unlikely that the citywide 5-year LCVAP estimate will be above 40% during the 2021 redistricting cycle. A 2021 survey midpoint for the 5-year ACS will not be available until the 2019-2023 ACS, which will be released at the block group level in January 2025.”
8. Mr. Cooper’s point here is that the 2021 redistricting cycle will necessarily draw upon a “stale” 5-year ACS file, with a survey midpoint of 2017 at that time. Redistricting efforts necessarily rely on the most current available (yet invariably “stale”) data. In mid-2021, that 5-year ACS file with a 2017 midpoint will indeed reflect the world four years ago (when, according to my Table 1 above, the Hispanic share of CVAP will be 39.5%). By late-2021, though, the 2020 1-year ACS measure of this Hispanic share (for the city as a whole) will update that “stale” estimate to mid-2020. Thus, the finalization of district boundaries likely to be done in early 2022 will be based on a near-perfect alignment in time: the full census count (referenced to April 1, 2020) and the 2020 1-year ACS estimate of Hispanics’ share of CVAP citywide (referenced to mid-2020).
9. The above clarification discredits Mr. Cooper’s subsequent statement at Paragraph 14: “In sum, while it is probable that for the 2021 redistricting cycle Pasco will be Latino citizen-majority under the 2016-2020 ACS – assuming no further dilutive annexations – Pasco will clearly not have a majority of Latino citizens of voting age by the 2021 cycle.”

Effect of Annexations on Latino Share of Population

10. In Paragraph 13, Mr. Cooper crafts a comparison that, intentionally or not, deceives the Court. The logic he advances is the reverse of what he states.
11. Mr. Cooper first reports the 1-year 2015 ACS Latino share of the total population as 49.7%, which describes Pasco as of 2015 (including all post-2010 annexations the Census Bureau incorporated in fielding its 2015 survey). Next, he juxtaposes the *earlier* 5-year 2010-2014 ACS Latino share of the total population (45.02%), which describes Pasco as of 2012 (which necessarily *excludes* post-2014 annexations). The lower Latino share as of 2012 relative to Latinos’ higher share as of 2015 documents Latinos’ rising share over time. Logic alone

precludes attributing the difference to “post-Census 2010 annexations,” because post-2010 annexations through 2014 can only be a subset of all post-2010 annexations through 2015.

Split Precincts

12. In Paragraph 15, Mr. Cooper disputes my claim that “district boundaries under Defendants’ Plan ‘align with virtually all the City’s existing precincts.’ In fact, the Defendants’ Plan splits populated areas in 9 of the 67 precincts encompassing all or part of Pasco.” This semantic difference—“virtually all” vs. 58 of 67—is a further red herring which rings hollow. Let us substitute “the vast majority (87%)” for “virtually all” here.

Latino Registered Voter Share

13. In Paragraph 16, Mr. Cooper challenges my estimate that Latinos represent 44% of all registered voters citywide. I assert that Latinos, as of October 2016, constitute 31.8% of Spanish-surnamed registered voters and therefore at least 31.8% of *Hispanic* registered voters of October 2016. (I routinely compute a related analytic measure—the implied “%Hispanic” share—which adjusts for false positives and negatives suggest what that standard “% SSN” measure might imply). Here is the supporting documentation for computing that analytic measure:

- a. Obtain the list of current registered voters from the Franklin County, WA Elections Department.
- b. Identify those registrants with Spanish surnames by matching each registrant’s surname against the US Census Bureau’s official dictionary of 12,497 surnames for identifying persons of probable Hispanic origin.
- c. Derive the “% Hispanic” among registrants by correcting the generally accepted measure (% Spanish Surnamed) for “false positives” and “false negatives” using state-specific correction factors in Perkins, 1993, Table 3 (<https://www.census.gov/population/www/documentation/twps0004.html>). This analytic measure accounts for self-identified Hispanics with a non-Spanish surname (e.g., Hispanic females married to non-Hispanic males) and self-

identified non-Hispanics with a Spanish surname (e.g., non-Hispanic females married to Hispanic males). The specific correction factors for the State of Washington are: $SOM=30.67$ and $SCOM=22.34\%$.

14. In paragraph 17, Mr. Cooper references his use of raw “Spanish Surnamed” counts of 2015 registered voters. To clarify the difference between our data: I rely on Spanish-surnamed counts of *October 2016* registered voters—i.e., updated to 2016—that are *corrected* for “false positives” and “false negatives”. Accordingly, my measure of Latinos’ presence among registered voters is both more current and more accurate than Mr. Cooper’s 2015 measures, based on uncorrected raw counts of Spanish-surnamed registrants more than a year ago.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 15, 2016

A handwritten signature in black ink, appearing to read "Peter A. Morrison", with a stylized, cursive script.

Peter A. Morrison, Ph.D.