

**From:** [Linda Sell](#)  
**To:** [2021redistricting](#)  
**Subject:** [EXTERNAL] Support for Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159  
**Date:** Monday, October 25, 2021 9:37:37 AM  
**Attachments:** [Support for Commissioner Pham Equal & Equitable 2 and Unity Compromise Map, ID-69159, Map Benefits.pdf](#)

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Dear 2021 Santa Clara County Redistricting Commissioners,

My name is Linda Sell. I am a resident of Sunnyvale. I am involved with two environmental non-profit organizations. I am a co-founder and vice chair of Bay Area for Clean Environment and a co-founder and advisor for Silicon Valley Youth Climate Action. I also currently serve as Vice Chair of Sunnyvale's Housing and Human Services Commission. I am writing here in my personal capacity on my own behalf and the organizations mentioned are only for identification purposes.

I have been active in the community in support of efforts that bring the community together for over a decade. These efforts included support for education, environment and unity efforts in Sunnyvale that supported the community's discussions and decision to move to form districts for Sunnyvale city elections. These efforts were in support of students, families, workers and the whole community. I have attached my research on this redistricting issue and support for the Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159. I am not an expert but my findings are attached.

In summary of my attached research on this redistricting issue, I am supporting the Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159 in which the compromise map takes into account some attributes from the other maps including the **Equal & Equitable 2.0 Map and Unity Map** to form a compromise map. Below are some benefits of the the Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159.

- (1) mountains and rural areas including: , Almaden, Gilroy, Morgan Hill, Lexington Hills, Los Gatos, and San Martin are kept together in one district which is good so that issues such as for example its residents being in close proximity to the mountains and therefore our community is highly interested in wildfire prevention programs
- (2) joins communities with similar transportation systems and transportation corridors.
- (3) keeps most cities whole in one district except for San Jose
- (4) appears to have similar racial voting age percentages to maps such as the most recent labeled Unity Map.
- (5) **Max. population deviation is 0.92% since all district populations are closely equal in population**

I also support the Equal & Equitable 2.0 map, ID: 66950 but the Commissioner Pham Equal & Equitable 2.0 is a better map.

I oppose the unity map because the Commissioner Pham Equal & Equitable 2.0 Map has more items that I agree with. I think the Commissioner Pham Equal & Equitable 2.0 is a better map than the unity map since it **takes into account some attributes of the Unity Map and other maps like the Equal & Equitable 2.0 map.**

Thank you to all the commissioners for your work to engage and listen to the community.

Regards,  
-Linda Sell



**Support for Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159, Map ([map excerpt](#))**

DistrictR Map [https://districtr.org/edit/69159?event=santa\\_clara\\_county](https://districtr.org/edit/69159?event=santa_clara_county)

Also shown on item 156 of [www.sccgov.org/2021redistricting/COI](http://www.sccgov.org/2021redistricting/COI)

1. [Keeps the rural communities and mountains in one district](#) which is good so that issues such as if its residents being in close proximity to the mountains and may be highly interested in wildfire prevention programs
2. [Joins communities with similar transportation systems and transportation corridors.](#) For example if a region does not have transit (Caltrain or light-rail) then its residents might be highly interested in bus service or shuttles as an alternative.
3. [Keeps most cities whole](#) except for San Jose People in the same cities may likely have several common interests.
4. In 5 districts, the populations of people are in compact areas which is good since people who live in close proximity could likely have common interests. However, due to the nature of district 1 being rural and near the mountains, the cities are more spread out but share the similar rural environment near the mountains.
5. [Max. population deviation is 0.92%](#) since all district populations are closely equal in population
6. [In all five of the districts this map has many similar or higher citizen voting age population by race percentages as compared to the citizen voting age population by race percentages of maps such as the one of the most recent posted Unity Map.](#)
  - According to the CA state redistricting reference<sup>1</sup>, my understanding is that there are several criteria that need to be met for the district to be a Voter Rights Act section 2 protected district (VRA). If a district does not meet all those criteria then it cannot be a Federal Voting Rights Act section 2 compliance district: "...VRA compliance is the only allowable reason for race to predominate in redistricting..Where the VRA does not apply, race may still be considered but cannot be a predominating factor..."<sup>1</sup>.
  - This map contains one district out of five districts that has a majority minority voting age population. Therefore this minority majority district might meet the first condition to be in Federal Voting Rights Act section 2 compliance. In addition, my understanding is that it would need to meet additional preconditions to be a VRA section 2 compliance district. In the other districts, I believe in which the VRA section 2 compliance district may not apply such as ones that do not appear to meet the first condition of having a minority majority citizen voting age population then, "race may still be considered but cannot be a predominating factor"<sup>1</sup>.

Also Support Map - **Equal & Equitable 2.0, ID: 66950** which has some similar benefits but Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159 is a better map than Equal & Equitable 2.0, ID: 66950 ([map excerpt](#))

[https://districtr.org/edit/66950?event=santa\\_clara\\_county](https://districtr.org/edit/66950?event=santa_clara_county)

<https://countyexec.sccgov.org/2021-redistricting-process/communities-interest>: #102

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<sup>1</sup> "2020 CRC Ready Reference." *Wedrawthelines.org*, 2020 California Citizens Redistricting Commission, 20 Oct. 2021, Federal Voting Rights Act Basics, page 12  
[https://d3n8a8pro7vhmx.cloudfront.net/ccrc/pages/358/attachments/original/1634753404/CRC\\_Ready\\_Reference\\_-\\_updated\\_%281%29.pdf?1634753404](https://d3n8a8pro7vhmx.cloudfront.net/ccrc/pages/358/attachments/original/1634753404/CRC_Ready_Reference_-_updated_%281%29.pdf?1634753404).

**1. Keeps the rural communities and mountains in one district:** On a slope, air rushes in more easily from the downhill than the uphill side and can push the flames faster and farther. Wildfires move much faster uphill. Climate change is here today as observed by the record fires and record heat. With climate effects there may be more frequent wildfires in the future. The most concerning byproducts of wildfires are the smallest particles that have long been linked to increased risk of illness and death affecting both cardiovascular and respiratory systems. In the long run, if global greenhouse gas emissions are not brought under control, fire seasons will grow longer and more violent.

Due to very close proximity to the mountains, the residents in the rural areas near the mountains might be more interested in wildfire prevention awareness, education and outreach which if these types of programs are championed as a priority then the programs that come out of this can help all the county districts. Some of the steps to take are regulated and planned cutting of trees, having firefighting tools nearby and handy; and emergency operations for similar areas. There could be advance planning such as "This includes a focus on our local codes and ordinances, home ignition zones, defensible space, ignition resistant construction and design standards, as well as hazardous fuels reduction in parks, common-owned areas, and open spaces."<sup>2</sup> Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map keeps communities of similar interests together such as those in the mountains, rural areas, Los Gatos, Almaden, Gilroy, Morgan Hill, Gilroy and San Martin in District 1 being in the same county district which could result in those communities expressing more interest in wildfire prevention, preparedness, and emergency operations. See figures 1.3a, 1.3b, 1.3c, 1.3d, and 1.3e for images showing some Santa Clara County District 1 rural cities and communities currently near the mountains. See figures 1.4a, 1.4b, 1.4c, and 1.4d for images showing some Santa Clara County District 5 cities that are not rural cities and not communities currently near the mountains.

Below is a comment about wildfires from a Santa Clara County Fire Department captain.

*"One thing we have seen about wildfires is that they are advancing so fast that we are unable to prove evacuation warnings and orders for citizens in place and we are also unable to back build a typical cellular infrastructure when the fire department starts to move in," [Santa Clara] county fire department captain Justin Stockman said. "That has a*

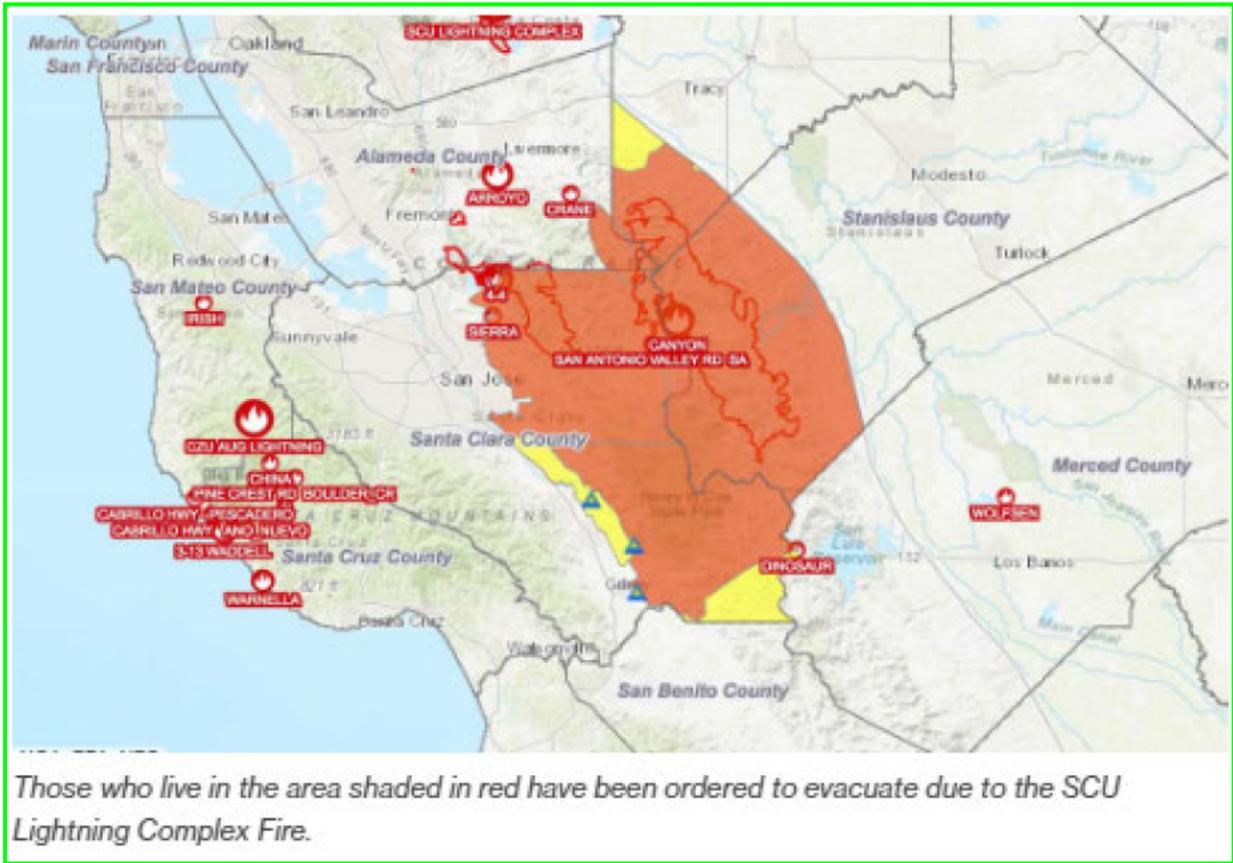
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<sup>2</sup> "Santa Clara County Community Wildfire Protection Plan." Santa Clara County Community Wildfire Protection Plan - Santa Clara County Fire Department, <https://www.sccfd.org/santa-clara-county-community-wildfire-protection-plan>.

direct negative impact on citizens and our ability to carry operations, so MOSES solves those problems.”<sup>3</sup>

Below in figure 1, it shows the area evacuated during SCU Lightning Complex Fires in 2020<sup>4</sup>. These wildfire evacuation areas are mostly in District 1 of the Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map.

Figure 1.1: Below is an image of the the area evacuated during SCU Lightning Complex Fires in 2020<sup>5</sup>. These wildfire evacuation areas are mostly in District 1 of the Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map.

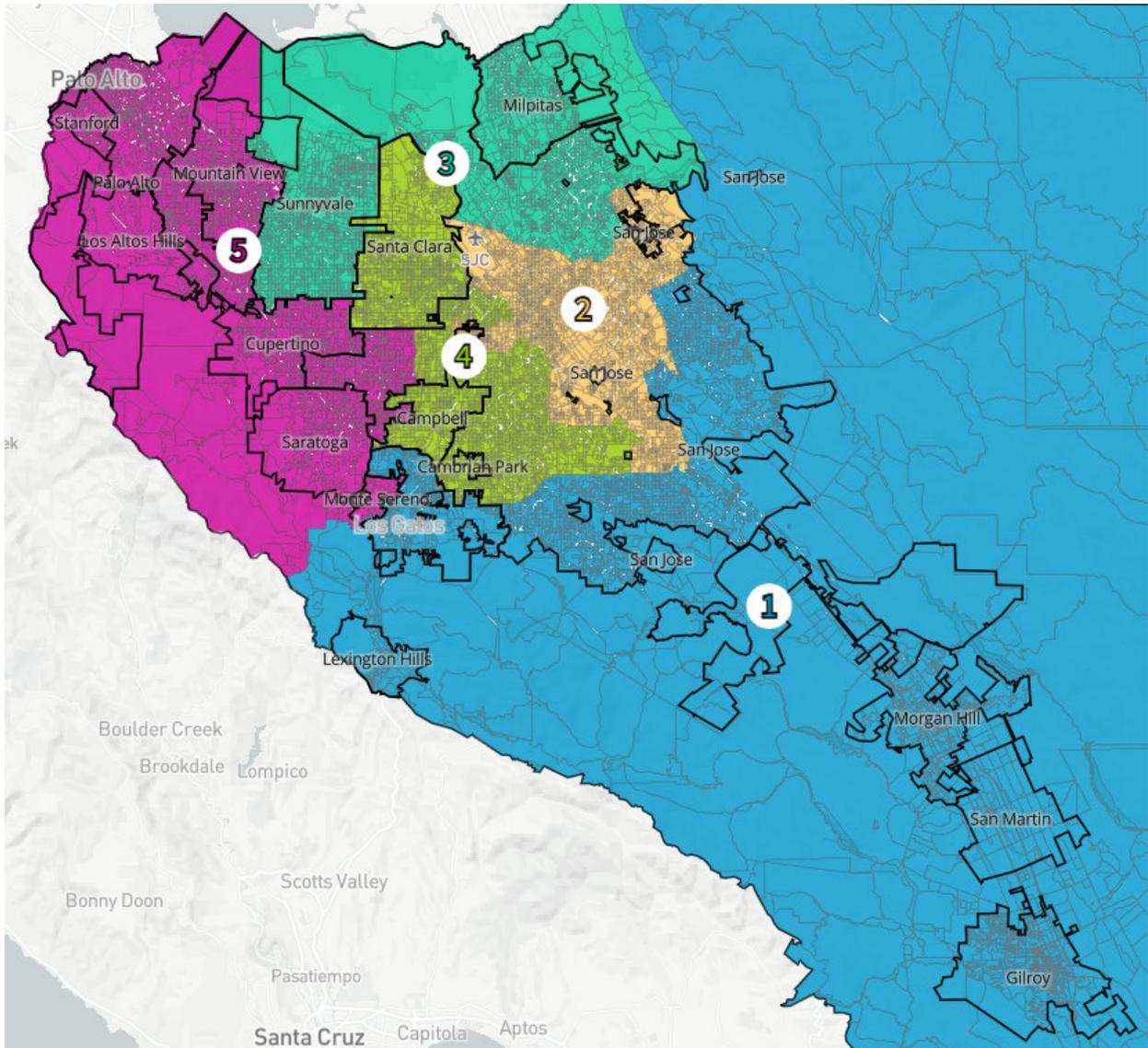


<sup>3</sup> CBS San Francisco. “Santa Clara County to Deploy New Wildfire Response Technology.” *CBS San Francisco*, CBS San Francisco, 15 Nov. 2020, <https://sanfrancisco.cbslocal.com/2020/11/15/wildfires-santa-clara-county-firefighting-technology-monitor/>.

<sup>4</sup> Fire evacuation order expanded to eastern Santa Clara County - Gilroy Dispatch: Gilroy, San Martin, CA, Gilroy Dispatch | Gilroy, San Martin, CA <https://gilroydispatch.com/fire-evacuation-order-expanded-to-eastern-santa-clara-county/>

<sup>5</sup> Fire evacuation order expanded to eastern Santa Clara County - Gilroy Dispatch: Gilroy, San Martin, CA, Gilroy Dispatch | Gilroy, San Martin, CA <https://gilroydispatch.com/fire-evacuation-order-expanded-to-eastern-santa-clara-county/>

Figure 1.2: The wildfire evacuation areas are mostly in District 1 of the Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map.

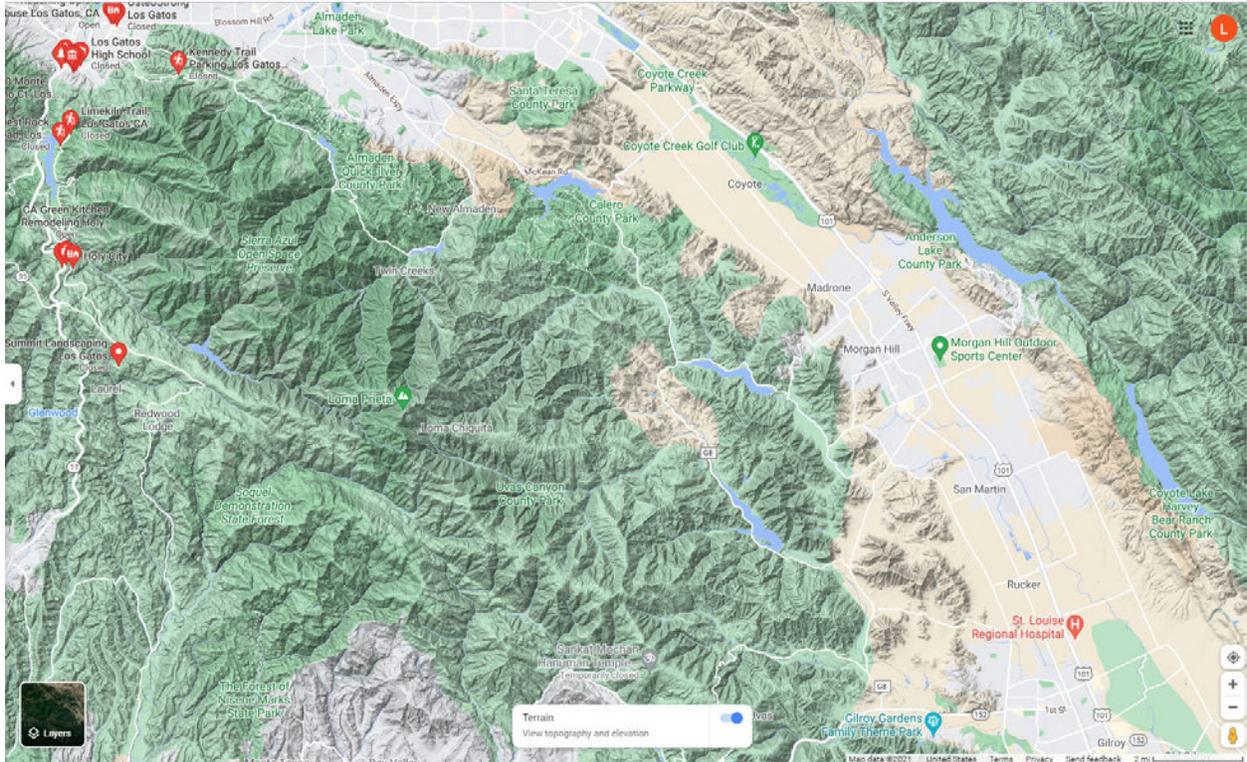


**Support for Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159, Map Benefits**

- DistrictR Map [https://districtr.org/edit/69159?event=santa\\_clara\\_county](https://districtr.org/edit/69159?event=santa_clara_county)  
Also shown on item 156 of [www.sccgov.org/2021redistricting/COI](http://www.sccgov.org/2021redistricting/COI)

Figure 1.3a: **District 1 (2021): Rural Area near Mountains**

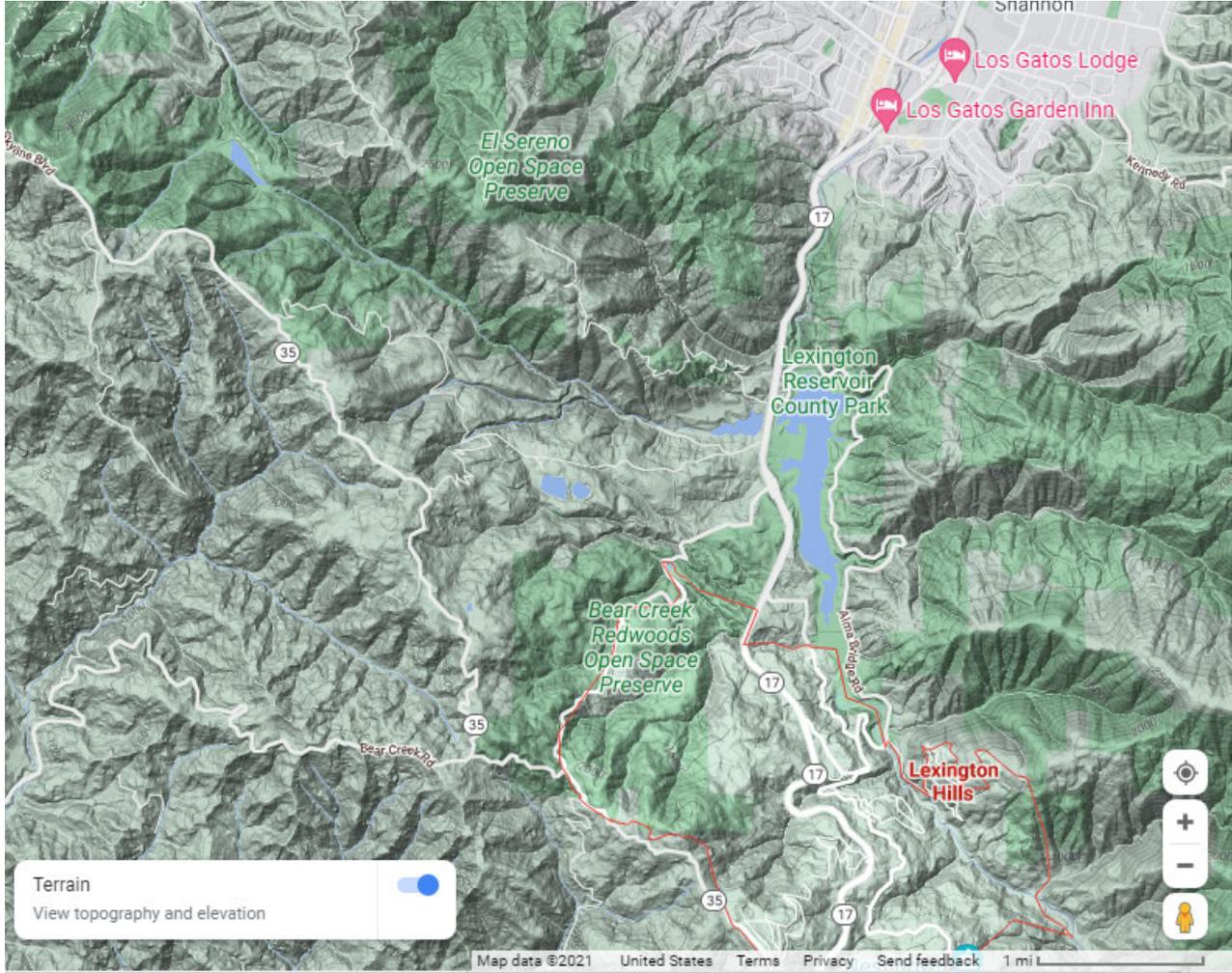
Some cities and communities that are currently in District 1 are shown below. They include Gilroy, San Martin, Morgan Hill, Almaden, Los Gatos, and Lexington Hills. They are more rural and near the mountains.



Google Maps

Figure 1.3b **District 1 (2021): Rural Area near Mountains**

Lexington Hills which is the unincorporated part of Los Gatos. Lexington Hills does not have its own town council. Lexington Hills residents' city address refers to the city of Los Gatos so Lexington Hills and Los Gato should not be separated.



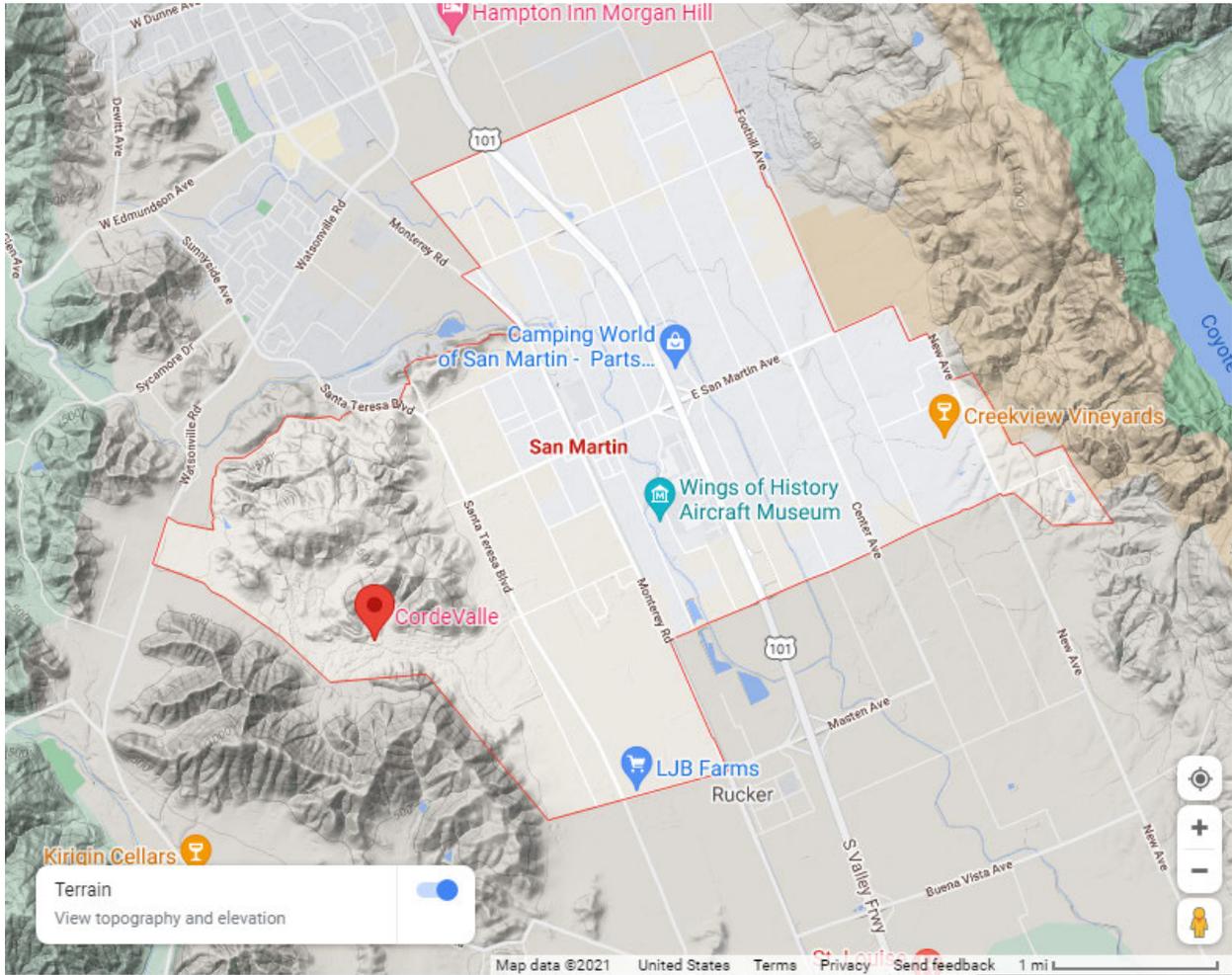
Google Maps

Figure 1.3c: District 1 (2021): Rural Area near Mountains  
Morgan Hill



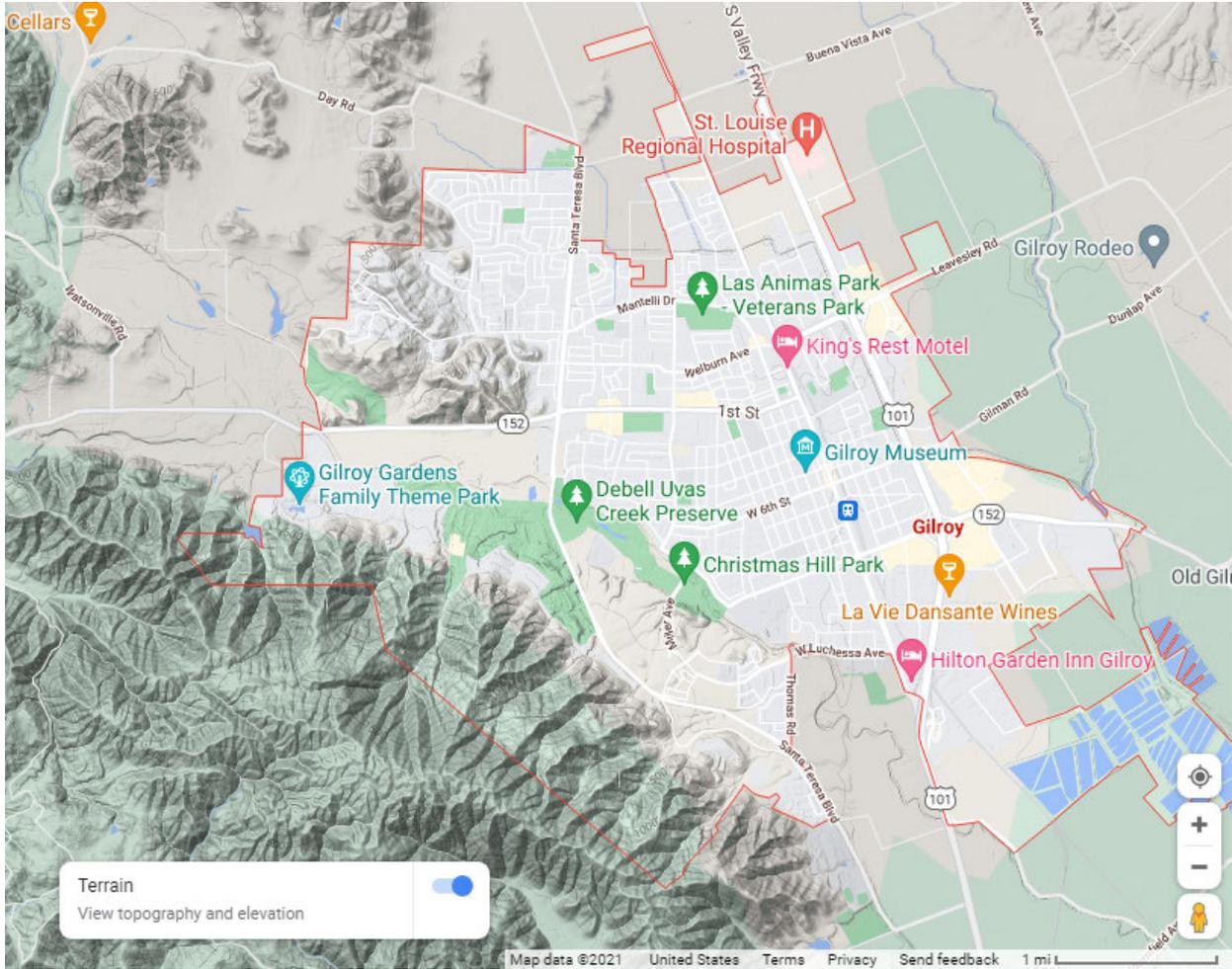
Google Maps

Figure 1.3d: **District 1 (2021): Rural Area near Mountains**  
San Martin



Google Maps

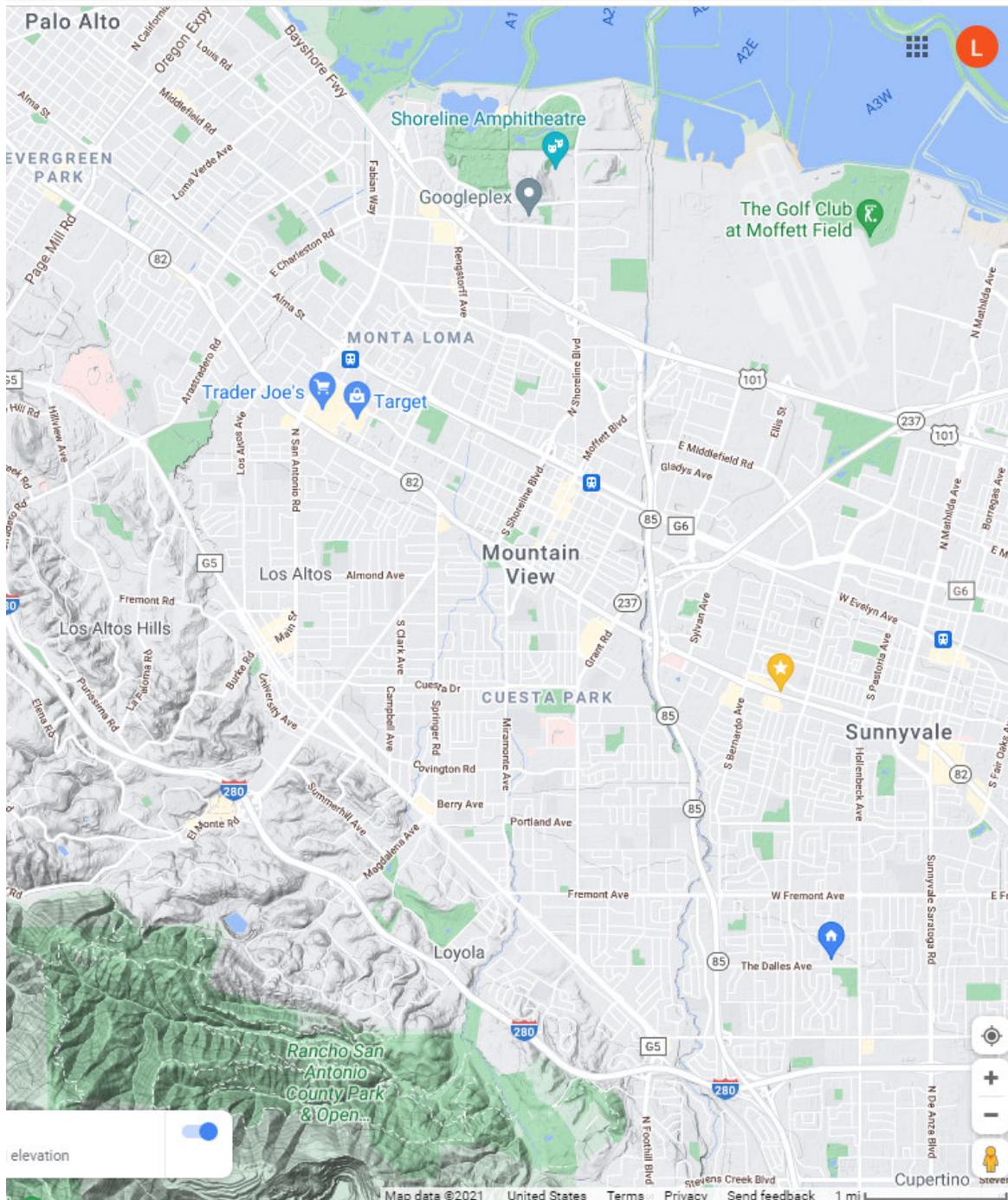
Figure 1.3e: **District 1 (2021): Rural Area near Mountains**  
Gilroy



Google Maps

Figure 1.4a: **District 5 (2021)**

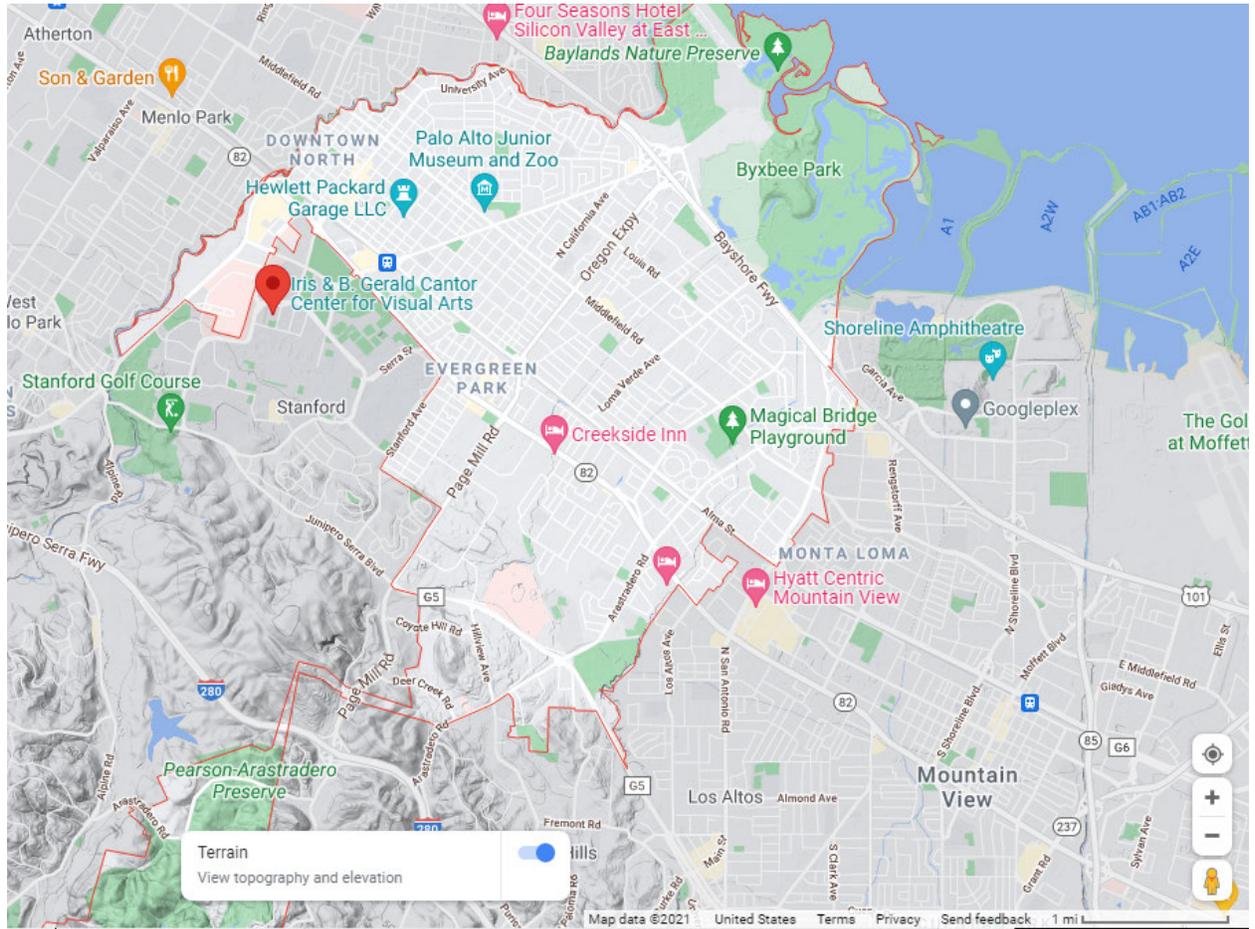
Some cities and communities that are currently in District 1 are shown below. The area shown below includes Palo Alto, Los Altos, Los Altos Hills, Mountain View, Cupertino and part of Sunnyvale. These cities are not near the mountains and not rural so the residents interests and needs at the county level may be different than the rural areas. For example, some cities are facing the San Francisco Bay so sea level rise and mitigating that challenge may become more of a concern in the coming years.



Google Maps

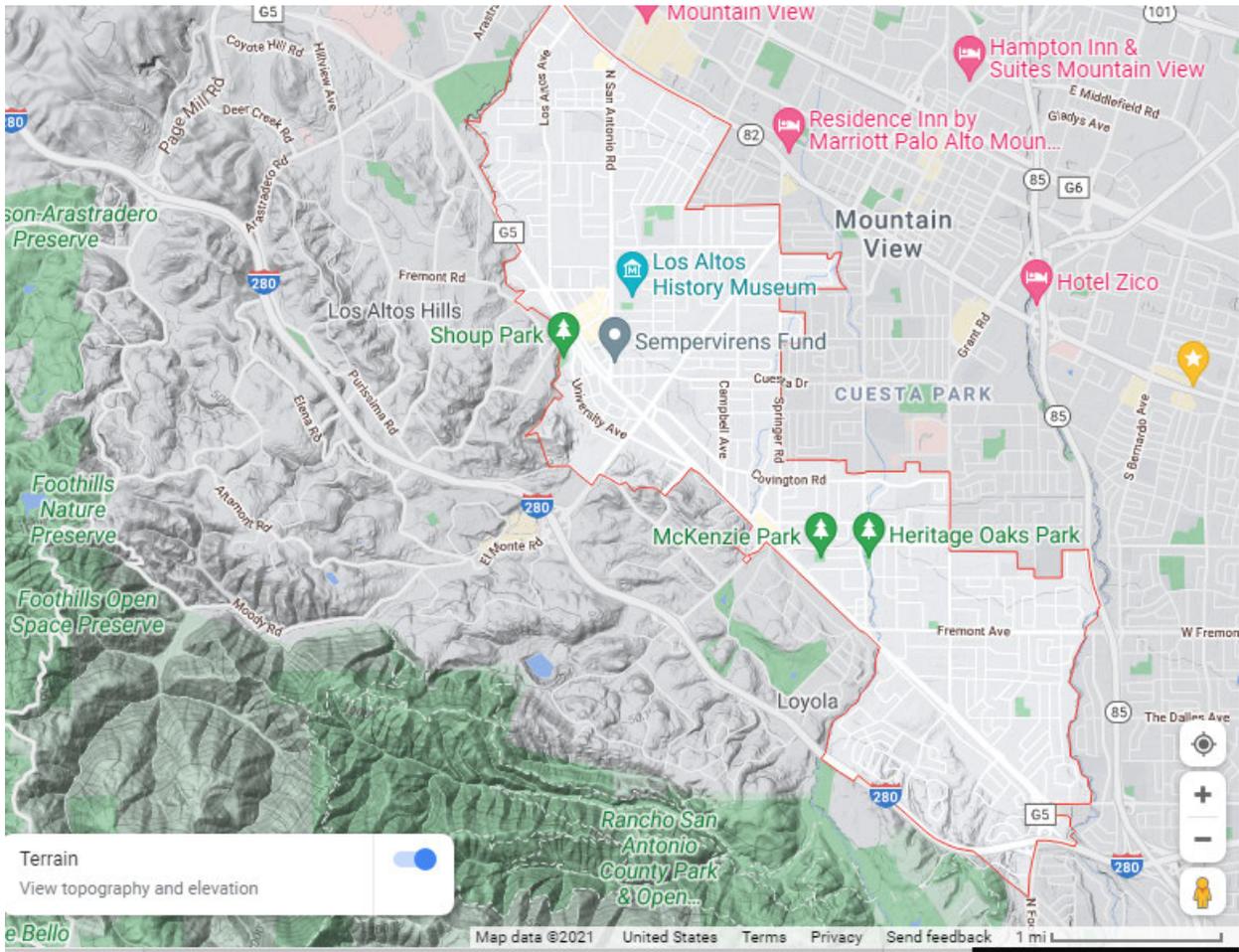
Figure 1.4b: **District 5 (2021)**

Palo Alto



Google Maps

Figure 1.4c: **District 5 (2021)**  
Los Altos

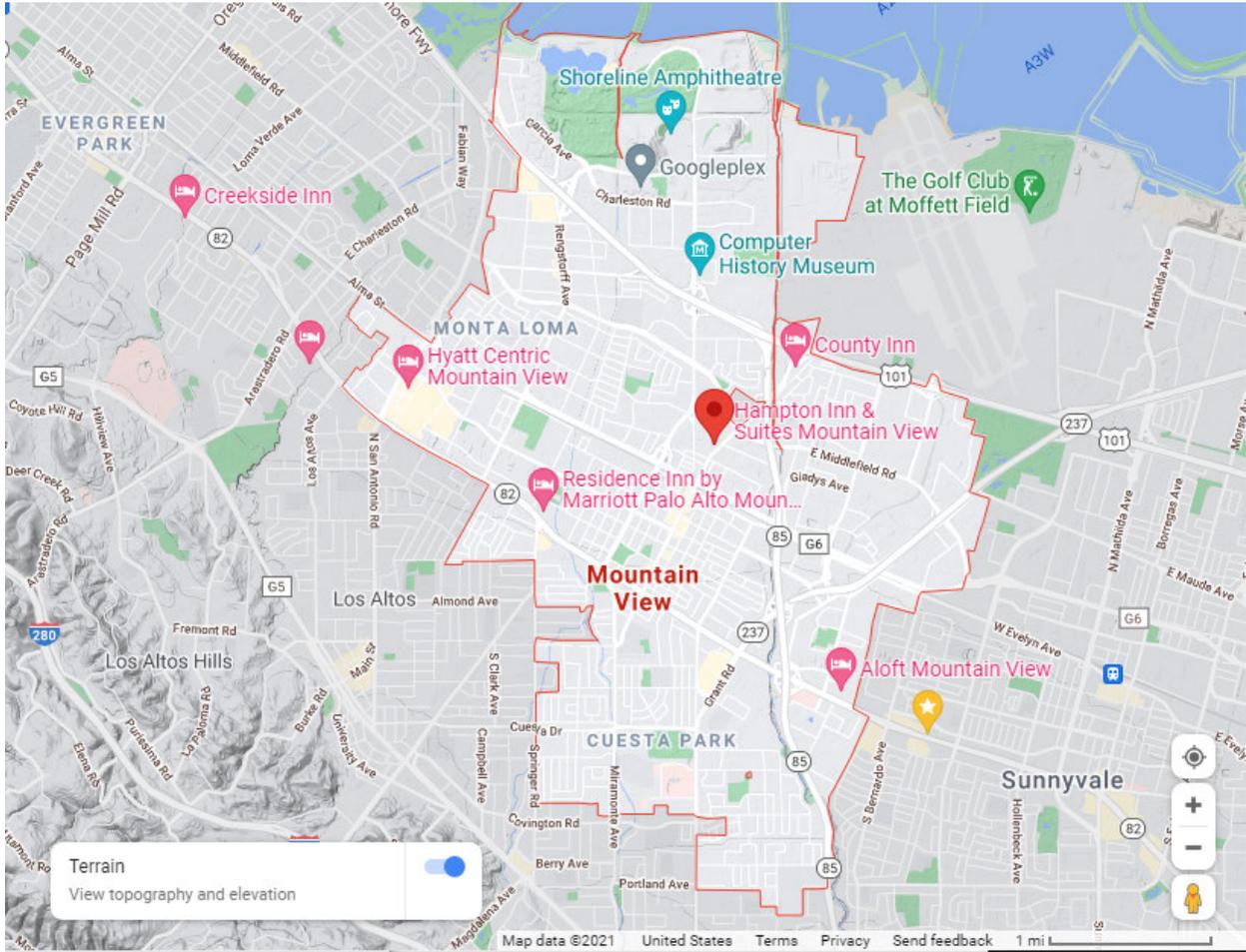


Google Map

Figure 1.4d: **District 5 (2021)**

Mountain View

Google Map



## Wildfire Background Information

The Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159 makes sense from a wildfires prevention and preparedness perspective and from a reduction of greenhouse gas perspective which was discussed previously with the more efficient transit systems.

Climate change is here today as observed by the record fires, record heat, and record storms. Studies have indicated that "Climate Change Will Give Rise to More Cancers: [UCSF Study Focuses on Global Impact for Major Cancers and Steps Needed to Lessen Risks](#)" "...The impacts of climate change on health are large and are expected to continue growing without rapid action. High temperatures, poor air quality and wildfires cause higher rates of respiratory and cardiovascular diseases..." and "There is a lot we can be doing to mitigate climate change..." said co-author Naomi Beyeler, MPH, co-director of the Evidence to Policy Initiative and Lead for Climate and Health at the UCSF Institute for Global Health Sciences." With this county redistricting, we have an opportunity to mitigate impacts of climate change by keeping the mountains and rural regions together so there is a focus on wildfire prevention and to have the district lines to follow transportation corridors for more effective planning for transit systems to be planned for reduction of greenhouse gases.

A recent article in the Santa Clara County Medical Association Magazine's The Bulletin<sup>16</sup>, "Silent calamity: The health impacts of wildfire smoke" was also published in the Yale Climate Connections which is an initiative of the Yale Center for Environmental Communication (YCEC). This article provides an overview of studies showing the deadly impacts of wildfire smoke and its links to climate change.

The article highlights an October 2020 policy brief in the Stanford Institute for Economic Policy Research<sup>7</sup>, "Managing the growing cost of wildfire," by Marshal Burke, et al. which describes the health burden brought on by these fires because of the massive production of PM<sub>2.5</sub> (particulate matter with a diameter of <2.5 um). The article discusses several ominous trends:

- The most concerning byproducts of wildfires are the smallest particles that have long been linked to increased risk of illness and death affecting both cardiovascular and respiratory systems.

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<sup>6</sup> Henson, Bob, "Silent calamity: The health impacts of wildfire smoke,"The Bulletin which is Official Magazine of the Santa Clara County Medical Association, Vol. 27 | No. 2, Second Quarter 2021, page 26 [https://issuu.com/18621/docs/scma\\_bulletin\\_q2\\_2021\\_web](https://issuu.com/18621/docs/scma_bulletin_q2_2021_web) and the Yale Climate Connections which is an initiative of the Yale Center for Environmental Communication (YCEC) <https://yaleclimateconnections.org/2021/05/silent-calamity-the-health-impacts-of-wildfire-sm>

<sup>7</sup> Burke, Marshall, "Managing the growing cost of wildfire," Stanford Institute for Economic Policy Research <https://siepr.stanford.edu/research/publications/managing-growing-cost-wildfire>

- In the long run, if global greenhouse gas emissions are not brought under control, fire seasons will grow longer and more violent. Therefore, we must reduce the impacts on climate that are also an important underlying driver of intensifying wildfires in California and the West.

The article also states

A recent Nature Communications study led by Rosana Aguilera, a postdoctoral researcher at the Scripps Institution of Oceanography, examined 14 years of Southern California fires. The authors found up to a 10% increase in respiratory hospitalizations for every 10  $\mu\text{g}/\text{m}^3$  increase in wildfire-specific PM2.5, compared to a 1.3% increase for non-wildfire PM2.5. Similarly, a 2020 study led by Daniel Kiser of the Desert Research Institute found that asthma-related visits to urgent care centers and emergency rooms in the Reno area were boosted by an additional 6.1% for every 5  $\mu\text{g}/\text{m}^3$  increase in PM2.5 for cases when wildfire smoke was present compared to when it was not present.

In summary, global greenhouse gas emissions will make the wildfire more violent and more frequent leading to serious health-hazards to the community. We ask that the redistricting commission do everything it can to draw lines for our county district which are critical to protect our community.

**2. Joins communities with similar transportation systems and transportation corridors:**

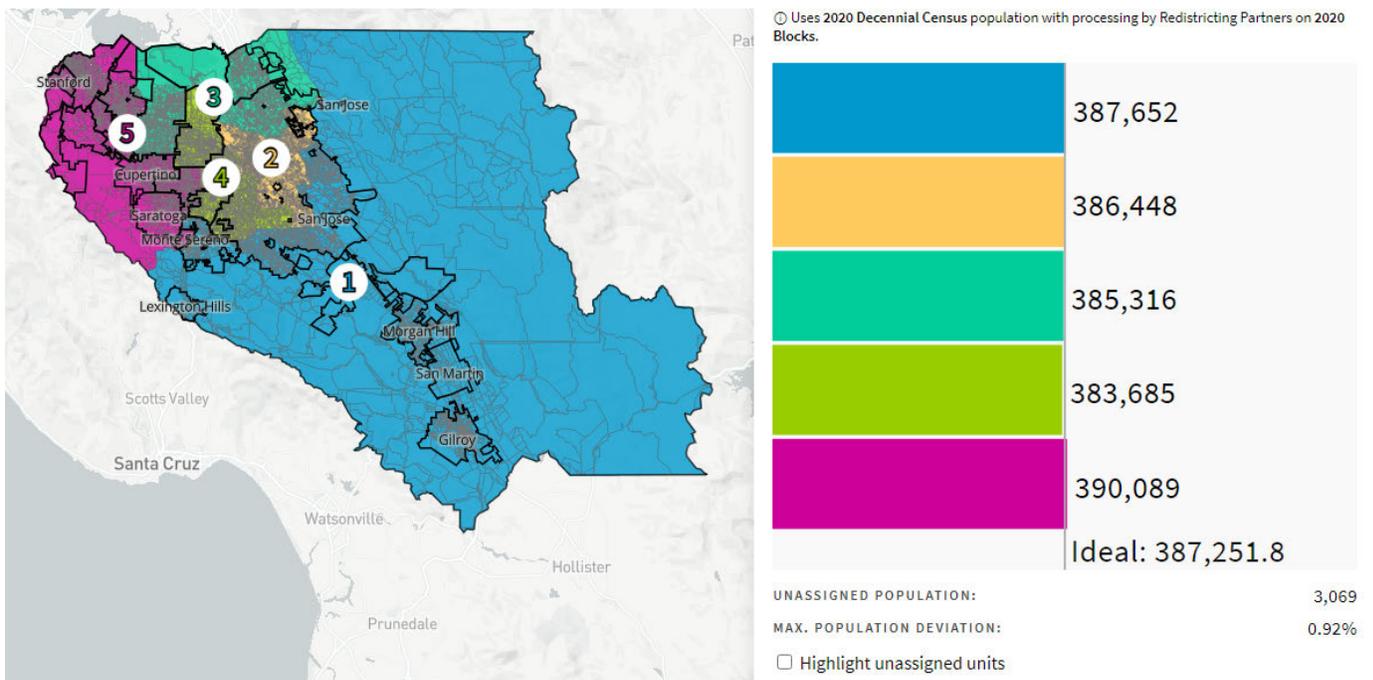
For example if a region does not have transit (Caltrain or light-rail) then its residents might be highly interested in bus service or shuttles as an alternative. Another example is District 5 cities which includes Palo Alto, Mountain View, Los Altos Hills, Los Altos: The four cities of Santa Clara County's northwest generally work together as one. All 4 are represented as one bunch to the transit agency, water board, and to the open space board.

**3. Keeps most cities whole:** Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map has all cities except for San Jose kept whole in one district: Campbell, Cupertino, Gilroy, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, Morgan Hill, Mountain View, Palo Alto, Saratoga, Santa Clara, San Martin, Sunnyvale, Stanford. The residents in the same city have similar interests so having the whole city in one district makes it effective for all the residents in a city to identify and communicate with their one county representative office.

## 5. Equal Population of Districts

### Support for Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159, Map Benefits

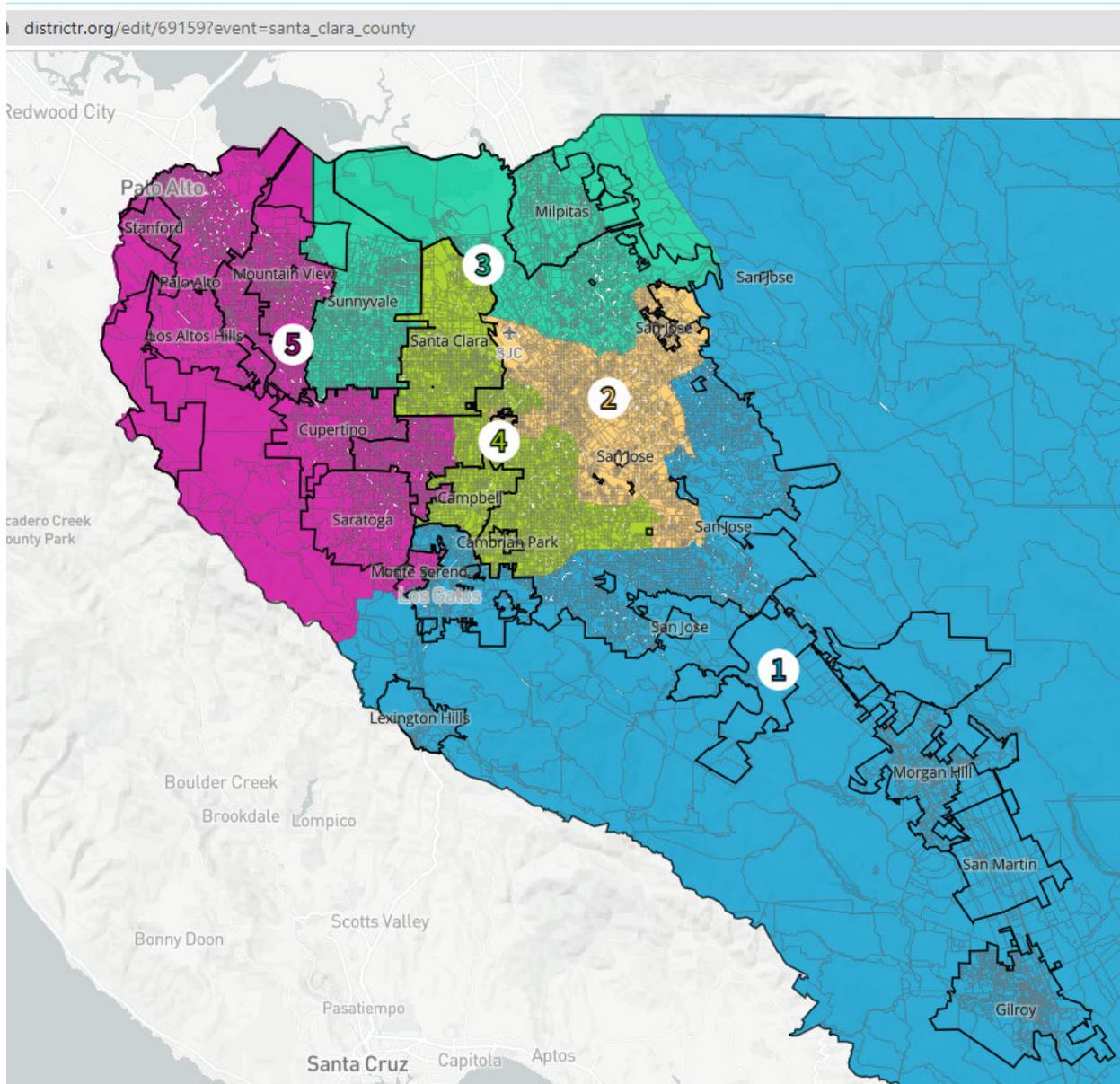
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**Support for Commissioner Pham Equal & Equitable 2.0 and Unity Compromise Map, ID:69159, Map**

DistrictR Map [https://districtr.org/edit/69159?event=santa\\_clara\\_county](https://districtr.org/edit/69159?event=santa_clara_county)

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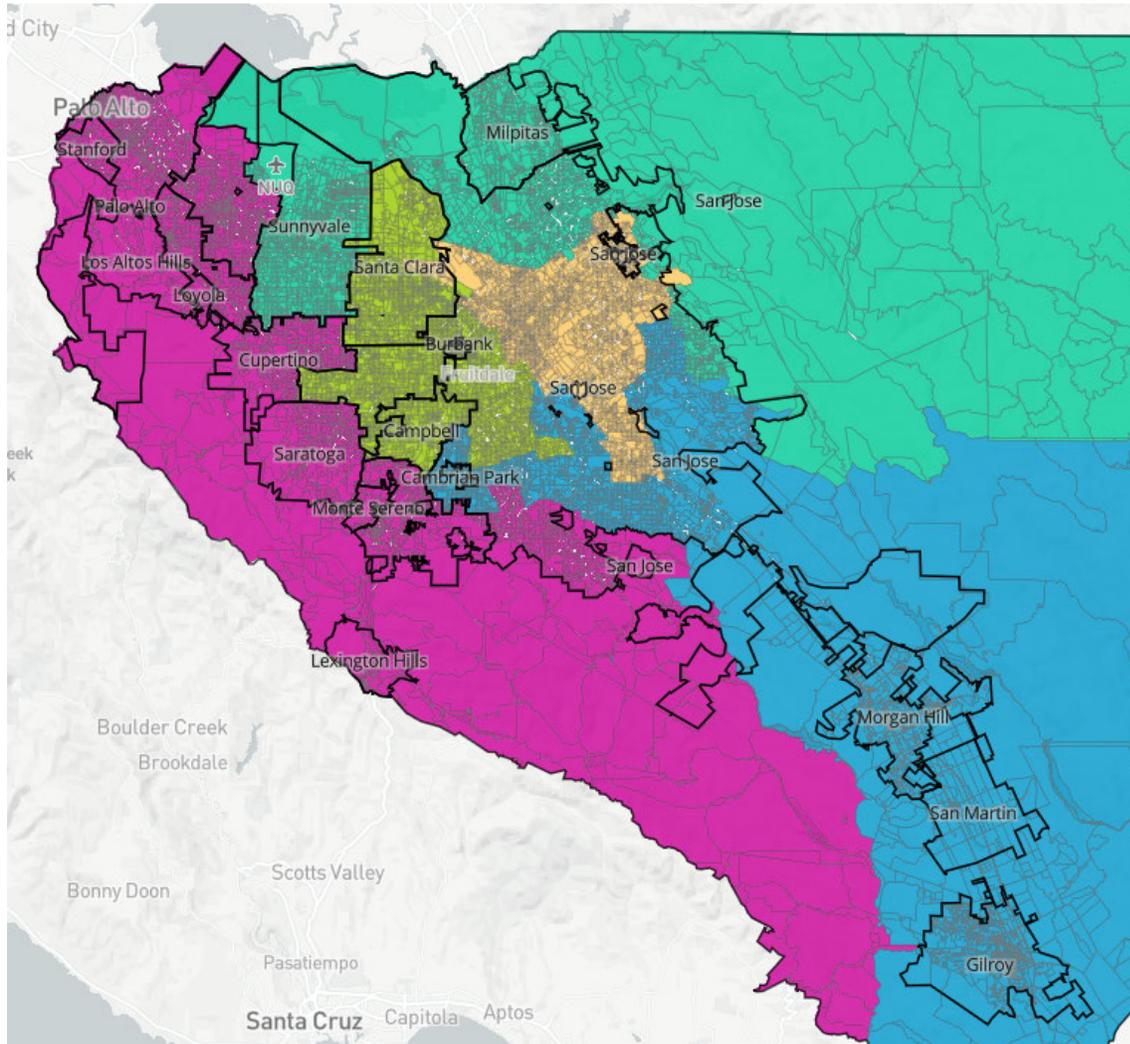




**Not Support Unity Map; ID: 67383**

<https://districtr.org/plan/63279>

[#109](https://countyexec.sccgov.org/2021-redistricting-process/communities-interest)



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6. In all five of the districts this map has many similar or higher citizen voting age population by race percentages as compared to the citizen voting age population by race percentages of maps such as the one of the most recent posted Unity Map.

- According to the CA state redistricting reference<sup>8</sup>, my understanding is that there are several criteria that need to be met for the district to be a Voter Rights Act section 2 protected district (VRA). If a district does not meet all those criteria then it cannot be a Federal Voting Rights Act section 2 compliance district: "...VRA compliance is the only allowable reason for race to predominate in redistricting..Where the VRA does not apply, race may still be considered but cannot be a predominating factor..."<sup>8</sup>.
- This map contains one district out of five districts that has a majority minority voting age population. Therefore this minority majority district might meet the first condition to be in Federal Voting Rights Act section 2 compliance. In addition, my understanding is that it would need to meet additional preconditions to be a VRA section 2 compliance district. In the other districts, I believe in which the VRA section 2 compliance district may not apply such as ones that do not appear to meet the first condition of having a minority majority citizen voting age population then, "race may still be considered but cannot be a predominating factor"<sup>8</sup>.

Equal & Equitable 2.0 (EE2), ID: 66950

<https://countyexec.sccgov.org/sites/g/files/exjcpb621/files/2021-10/102%20Map%20of%20Equal%20%26%20Equitable%202.0.pdf>

Unity Map, ID: 63279

<https://countyexec.sccgov.org/sites/g/files/exjcpb621/files/2021-10/109%20Updated%20Unity%20Map.pdf>

Commissioner Pham posted Commissioner Pham EE2 & Unity Compromise 2

see item 156 [www.sccgov.org/2021redistricting/COI](http://www.sccgov.org/2021redistricting/COI)

[https://districtr.org/edit/69159?event=santa\\_clara\\_county](https://districtr.org/edit/69159?event=santa_clara_county)

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<sup>8</sup> "2020 CRC Ready Reference." *Wedrawthelines.org*, 2020 California Citizens Redistricting Commission, 20 Oct. 2021, Federal Voting Rights Act Basics, page 12  
[https://d3n8a8pro7vhmx.cloudfront.net/ccrc/pages/358/attachments/original/1634753404/CRC\\_Ready\\_Reference\\_-\\_updated\\_%281%29.pdf?1634753404](https://d3n8a8pro7vhmx.cloudfront.net/ccrc/pages/358/attachments/original/1634753404/CRC_Ready_Reference_-_updated_%281%29.pdf?1634753404).

Highlight in green is if the Citizen Voting Age Population by race for Commissioner Pham EE2 & Unity Compromise 2 Compromise Map, ID:69159 or Equal & Equitable 2.0, ID: 66950 map is the same or higher than the **Unity Map, ID: 63279's** Citizen Voting Age Population by race.

Table 1: District 1

	<b>Hispanic</b>	<b>Asian</b>	<b>Black</b>
<b>Equal &amp; Equitable 2.0, ID: 66950</b>	21.4%	25.5%	1.9%
<b>Unity Map, ID: 63279</b>	25.1%	23.5%	2.7%
<b>Commissioner Pham EE2 &amp; Unity Compromise 2 Compromise Map, ID:69159</b>	21.5%	26.3%	2.1%

Table 2: District 2:

	<b>Hispanic</b>	<b>Asian</b>	<b>Black</b>
<b>Equal &amp; Equitable 2.0, ID: 66950</b>	39.4%	32.6%	3.3%
<b>Unity Map, ID: 63279</b>	40.7%	33.7%	3.1%
<b>Commissioner Pham EE2 &amp; Unity Compromise 2 Compromise Map, ID:69159</b>	40.7%	30.3%	3.2%

Table 3: District 3

	<b>Hispanic</b>	<b>Asian</b>	<b>Black</b>
<b>Equal &amp; Equitable 2.0, ID: 66950</b>	15.4%	50.2%	2.5%
<b>Unity Map, ID: 63279</b>	15.1%	50%	2.4%
<b>Commissioner Pham EE2 &amp; Unity Compromise 2 Compromise Map, ID:69159</b>	15.7%	50.1%	2.5%

Table 4: District 4

	<b>Hispanic</b>	<b>Asian</b>	<b>Black</b>
<b>Equal &amp; Equitable 2.0, ID: 66950</b>	17.5%	19.6%	3.1%
<b>Unity Map, ID: 63279</b>	16%	23.5%	2.9%
<b>Commissioner Pham EE2 &amp; Unity Compromise 2 Compromise Map, ID:69159</b>	16.5%	20.1%	2.9%

Table 5: District 5: North County

	<b>Hispanic</b>	<b>Asian</b>	<b>Black</b>
<b>Equal &amp; Equitable 2.0, ID: 66950</b>	7.1%	34%	1.5%
<b>Unity Map, ID: 63279</b>	6.1%	29.8%	1.3%
<b>Commissioner Pham EE2 &amp; Unity Compromise 2 Compromise Map, ID:69159</b>	6.6%	34.5%	1.6%

Below is a excerpt from a reference that discusses Federal Voting Rights Act Basics. "This summary of the VRA is a general description and is not intended to be legally precise"<sup>9</sup>

The goal of VRA compliance is to prevent **minority vote dilution**. Presently, only **Section 2** of the VRA is operative. Note that the VRA is explicitly not a guarantee of racially **proportional representation**.

To establish a violation of Section 2, a plaintiff must prove, "based on the **totality of circumstances**," that the State's "political processes" are "not equally open to participation by members" of a protected class, "in that its members have **less opportunity** than other members of the electorate to participate in the political process and to elect representatives of their choice."

A "**protected class**" is a group defined by (any) race, color, or membership in a language minority ("language minority" = "American Indian, Asian American, Alaskan Natives or of Spanish heritage").

A Section 2 plaintiff must first prove the **Gingles** ["JING gulls"] preconditions apply, and only then build a case using the **Senate Factors** + any other considerations that inform the "totality of circumstances."

**Gingles Preconditions** (1986):

1. Minority population sufficiently large and compact enough to form a single district
2. Minority group politically cohesive (via RPV analysis)
3. Majority group politically cohesive (via RPV analysis) and regularly opposes the minority vote; the majority group need not be any particular race or only a single race as long as it votes as a bloc

Gingles #1 is measured using Citizens of Voting Age Population (CVAP). "**Large**" means over 50% of the CVAP. "**Compact**" can include non-contiguous areas if they are in reasonable proximity and share similar interests. Note that Gingles #1 cannot be met via a **crossover district**, with minority + part of majority voting as a bloc [but what about 2/+ minority groups aggregated in a coalition?—"yes" in some U.S. Circuit Court decisions but not yet fully settled by the SCOTUS].

VRA compliance is the only allowable reason for race to predominate in redistricting. Such compliance must meet "**strict scrutiny**"—using "narrowly tailored" and "least restrictive means" to achieve a "compelling state interest" (*Shaw v. Reno*, 1993). Where the VRA does not apply, race may still be considered but cannot be a predominating factor.

<sup>9</sup> 2020 CRC Ready Reference." *Wedrawthelines.org*, 2020 California Citizens Redistricting Commission, 20 Oct. 2021, Federal Voting Rights Act Basics, page 12  
[https://d3n8a8pro7vhmx.cloudfront.net/ccrc/pages/358/attachments/original/1634753404/CRC\\_Ready\\_Reference\\_-\\_updated\\_%281%29.pdf?1634753404](https://d3n8a8pro7vhmx.cloudfront.net/ccrc/pages/358/attachments/original/1634753404/CRC_Ready_Reference_-_updated_%281%29.pdf?1634753404).