

The Honorable Robert S. Lasnik

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

SUSAN SOTO PALMER, et al.,  
  
Plaintiffs,  
  
v.  
  
STEVEN HOBBS, et al.,  
  
Defendants.  
  
JOSE TREVINO, et al.  
  
Intervenor-Defendants.

NO. 3:22-cv-05035-RSL  
  
DECLARATION OF NICHOLAS  
PHARRIS IN SUPPORT OF DEFENDANT  
SECRETARY OF STATE STEVEN  
HOBBS’S MEMORANDUM  
REGARDING REMEDIAL MAPS

I, Nicholas Pharris, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am currently employed as the Support Lead for the VoteWA/TotalAddress election management system in the Elections Division of the Office of the Secretary of State, a position I have held since 2019.
2. In 2011 and 2012, I worked for the Washington State Redistricting Commission as a GIS and data analyst.
3. I served as Washington’s designated Redistricting Data Liaison for the 2020 Census.

1 4. Following the adoption of the 2021 Redistricting Commission’s final plan, I  
2 worked with county election administrators to review the proposed redistricting changes and  
3 identify technical fixes to district lines necessary for effective election administration.

4 5. I have reviewed the proposed Remedial Map 3A to identify technical issues and  
5 proposed solutions.

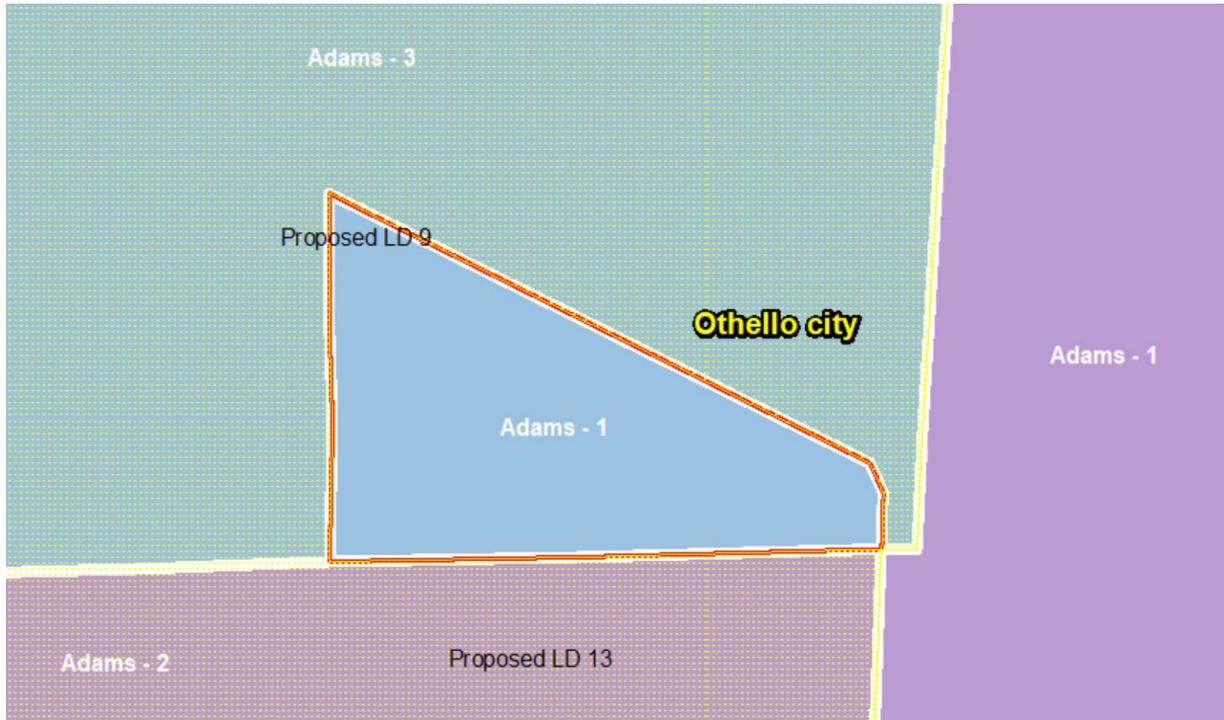
6 6. Washington law creates certain requirements related to voting precincts.  
7 Specifically, RCW 29A.16.050 provides as follows:

- 8 (1) Every voting precinct must be wholly within a single congressional  
9 district, a single legislative district, a single district of a county  
10 legislative authority, and, if applicable, a single city.  
11 (2) Every voting precinct shall be composed, as nearly as practicable, of  
12 contiguous and compact areas.

13 7. The statutory restrictions related to precincts mean that “trapped polygons”—  
14 areas caught between county boundaries, congressional district lines, legislative district lines,  
15 county council or commissioner district lines, and city or town limits—are supposed to be made  
16 into separate voting precincts. Sometimes these areas are unpopulated, creating a (marginal)  
17 waste of resources for the county and in the state elections database. Sometimes they contain a  
18 small population, which is worse, because it jeopardizes the secrecy of the ballots of any voters  
19 residing there.

20 8. Since it is the legislative district lines that are at issue here, I include below only  
21 those trapped polygons created specifically by the location of the legislative district lines  
22 proposed under proposed Remedial Map 3A.

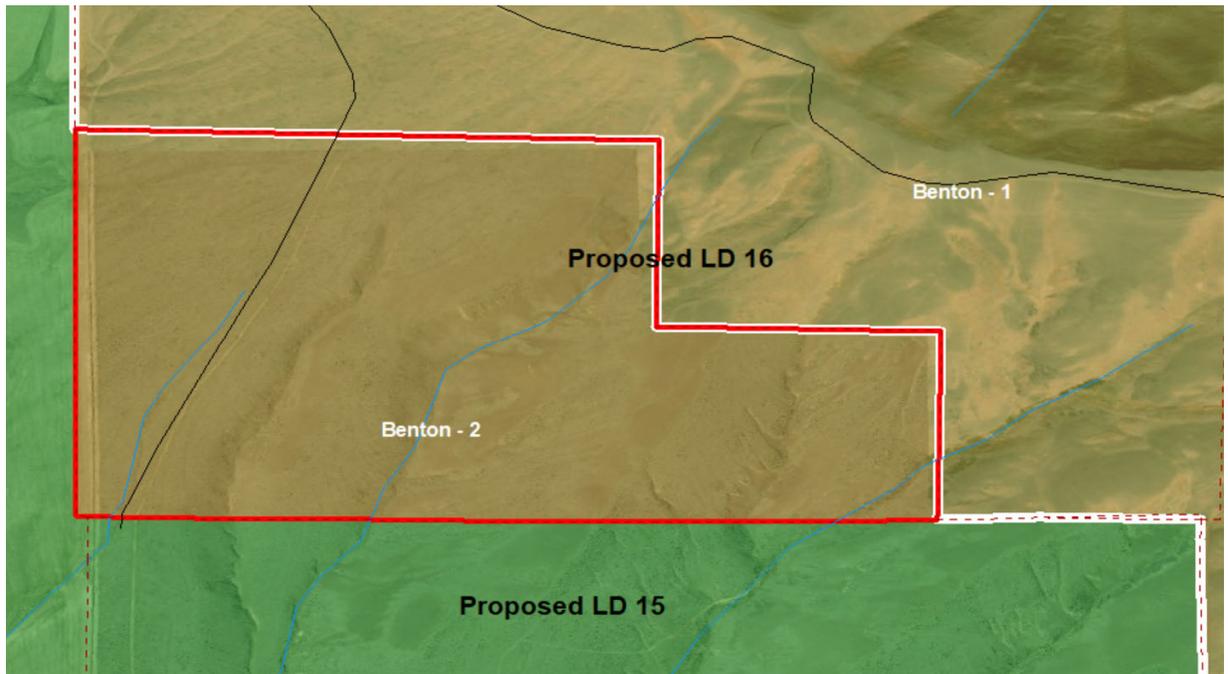
23 9. Adams County: LD 9/LD 13 (colored areas), Adams County Commissioner  
24 Districts 1, 2, and 3 (white lines), city limits of Othello (yellow lines and stippling):  
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25 A possible remedy is to move block 530019505001067 (population 8) from LD 9 to  
 26 LD 13. This area is actually contiguous with the unincorporated area to the east in LD 13 along

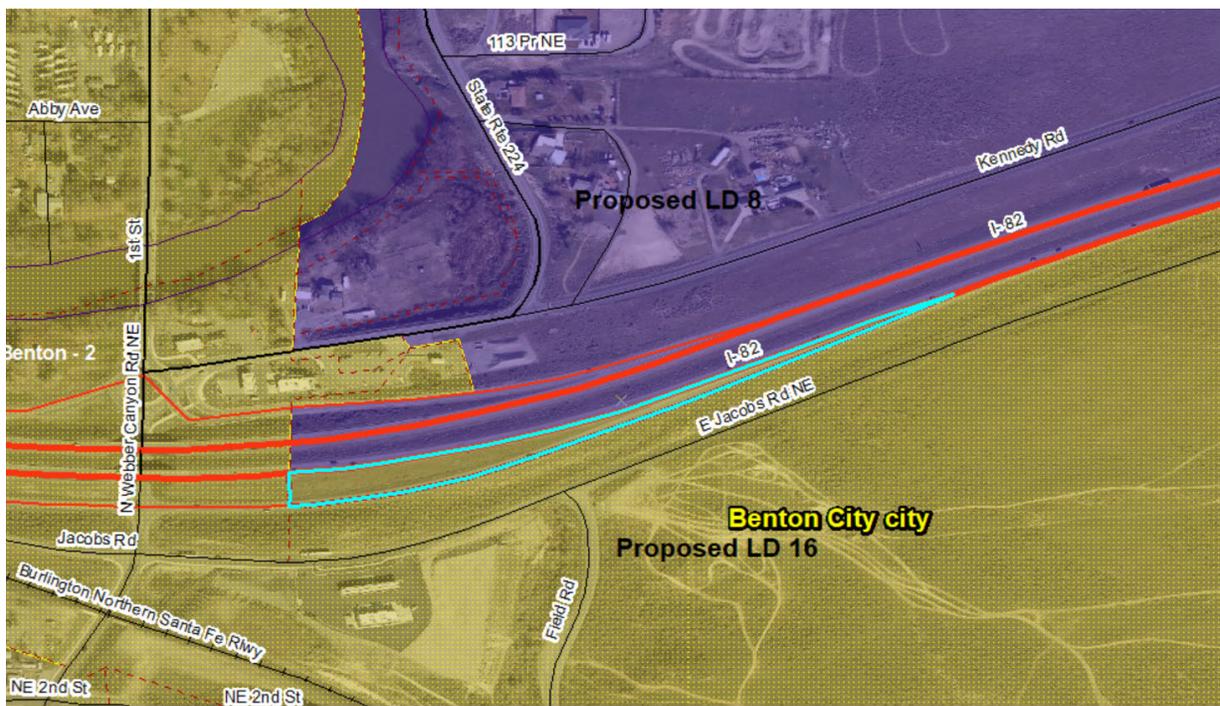
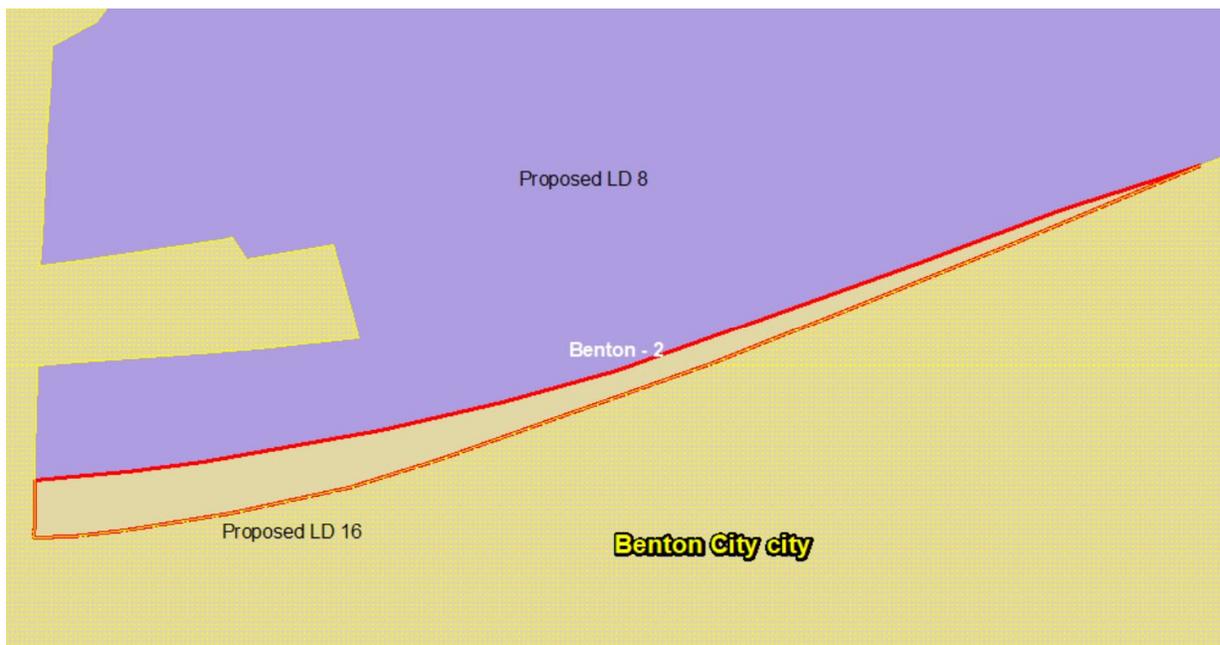
1 the right of way of Cemetery Rd; for Census purposes, the city limits are approximated as  
2 running along the centerline of the road.

3 10. Benton County: LD 15/LD 16, Benton County Commissioner Districts 1 and 2:



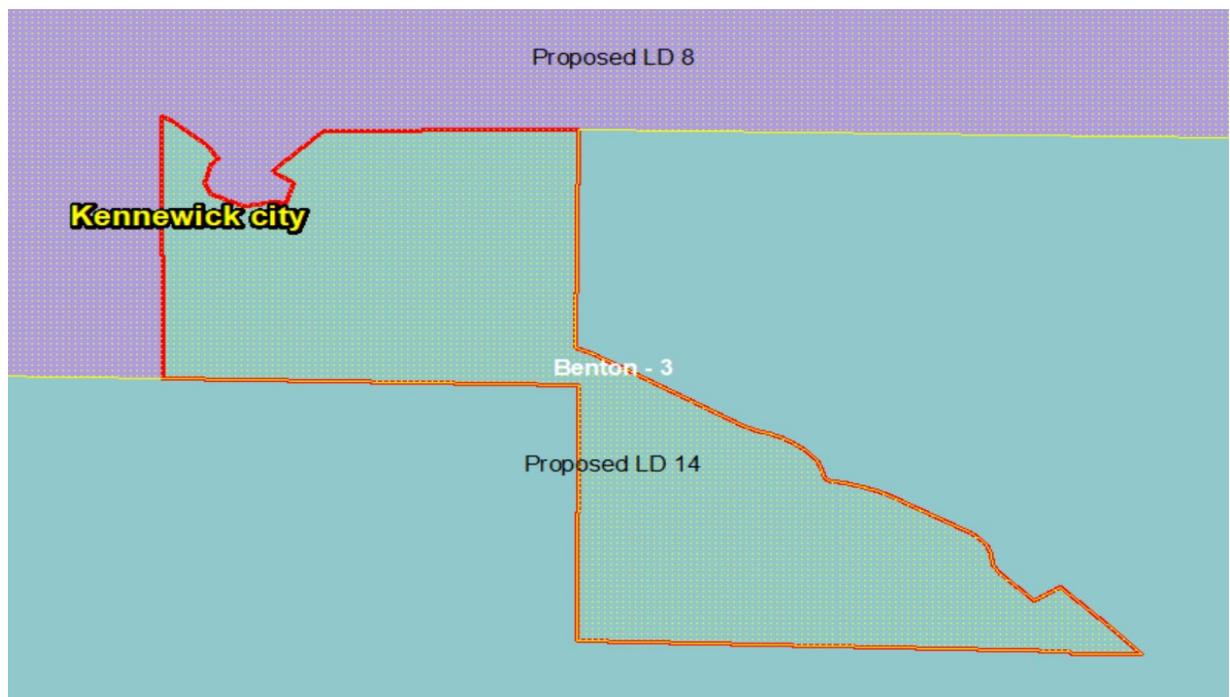
1 A possible remedy is to move block 530050120001039 (population zero) from LD 16 to  
2 LD 15.

3 11. Benton County: LD 8/LD 16, city limits of Benton City:



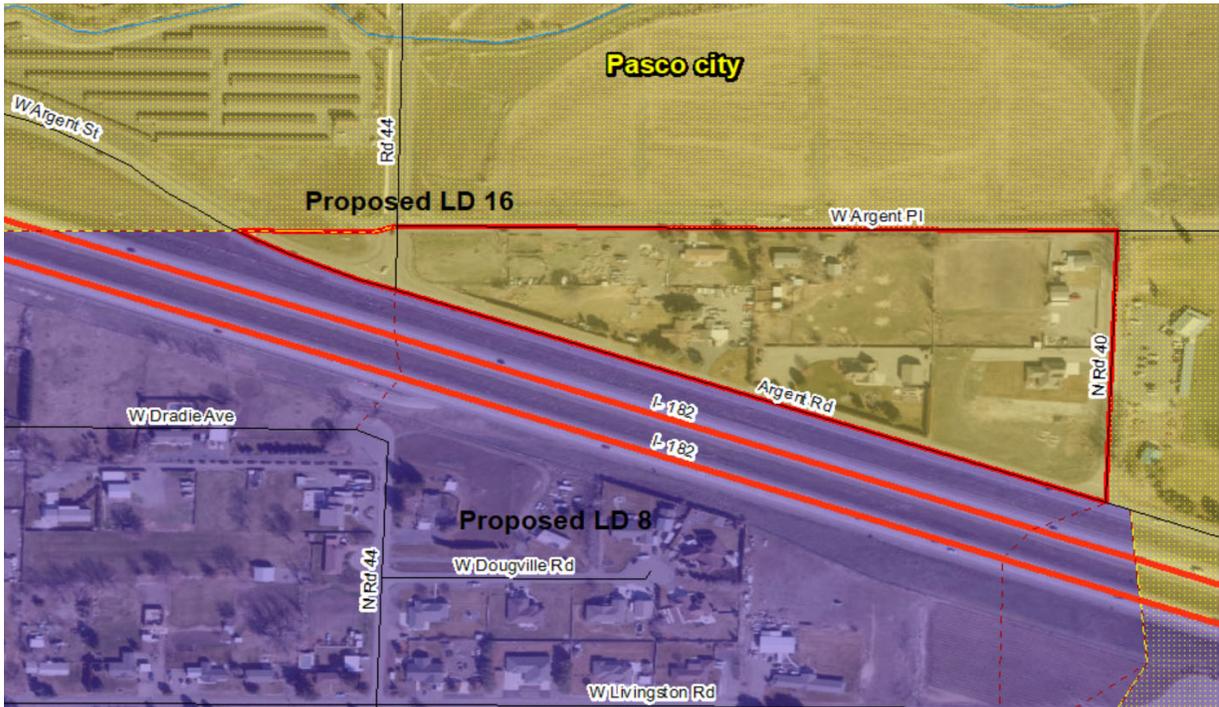
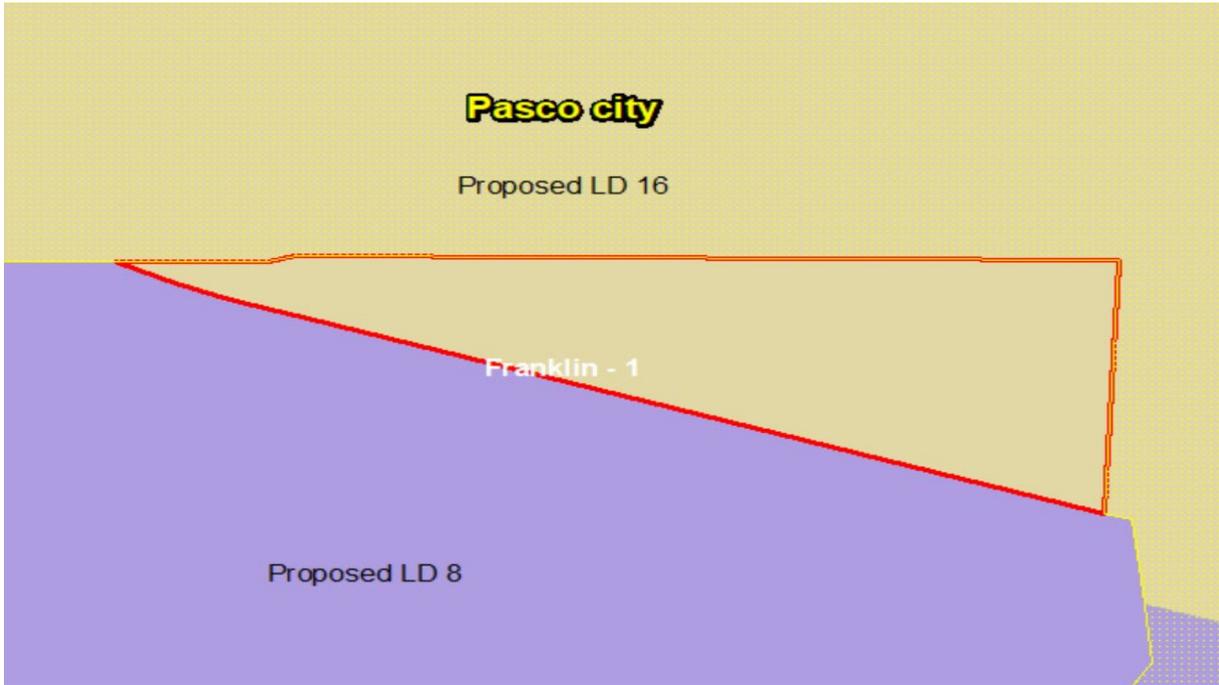
1 A possible remedy is to move block 530050108071017 (population zero) from LD 16 to  
2 LD 8.

3 12. Benton County: LD 8/LD 14, city limits of Kennewick as modified by Ordinance  
4 6001, effective 12/14/2022:



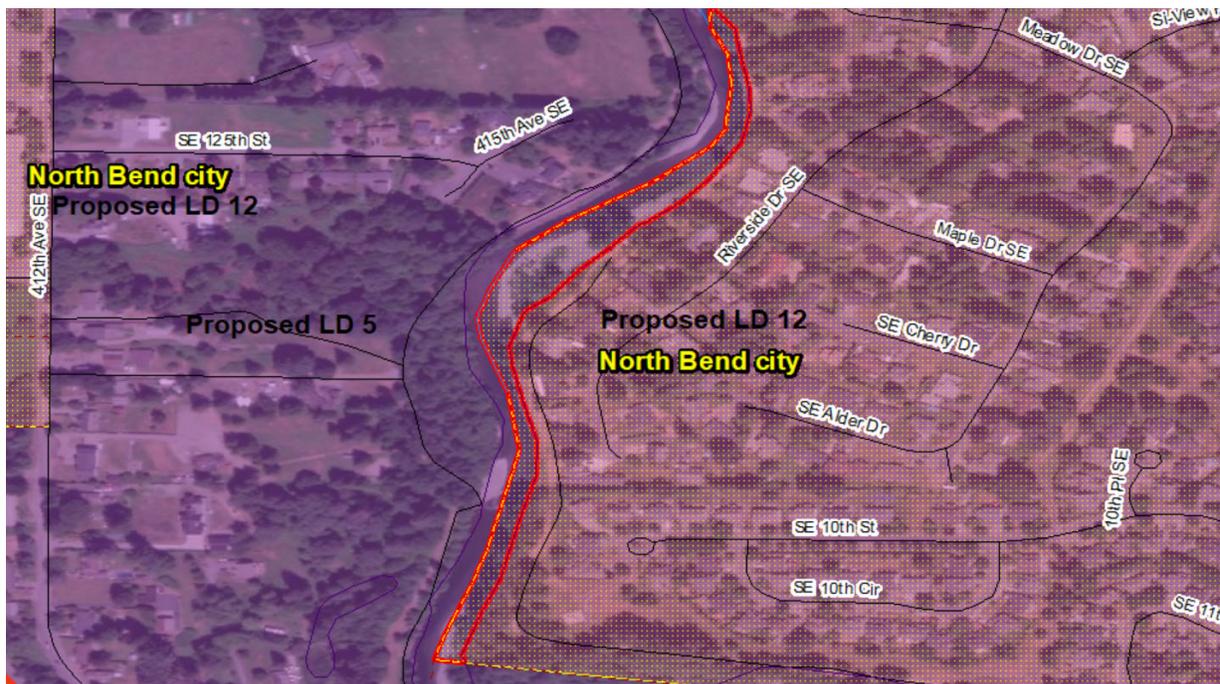
1 A possible remedy is to move blocks 530050115042006 and 530050115061031 (total  
2 population 8) from LD 14 to LD 8.

3 13. Franklin County: LD 8/LD 16, city limits of Pasco:



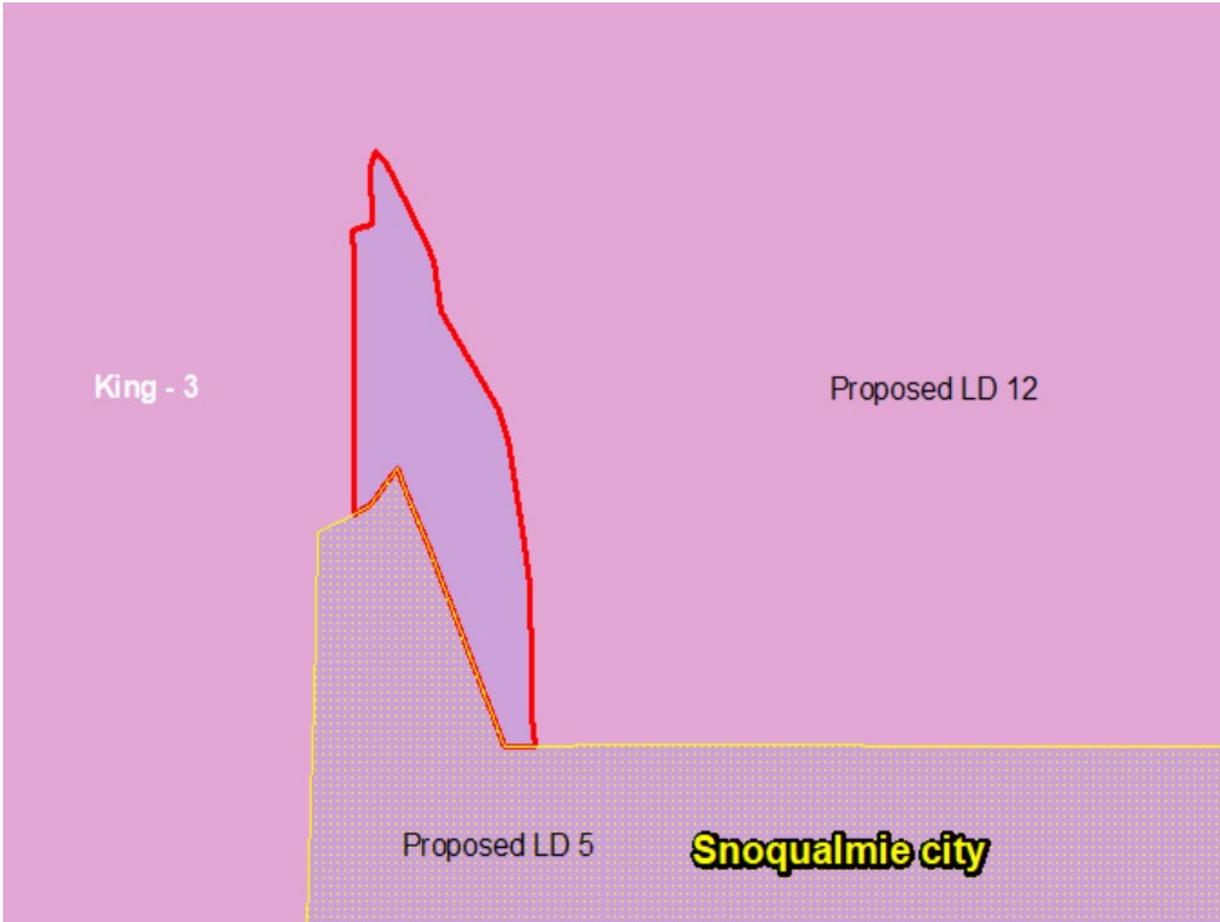
1 A possible remedy is to move blocks 530210206051057 and 530210206051059 (total  
2 population 17) from LD 16 to LD 8.

3 14. King County: LD 5/LD12, city limits of North Bend:

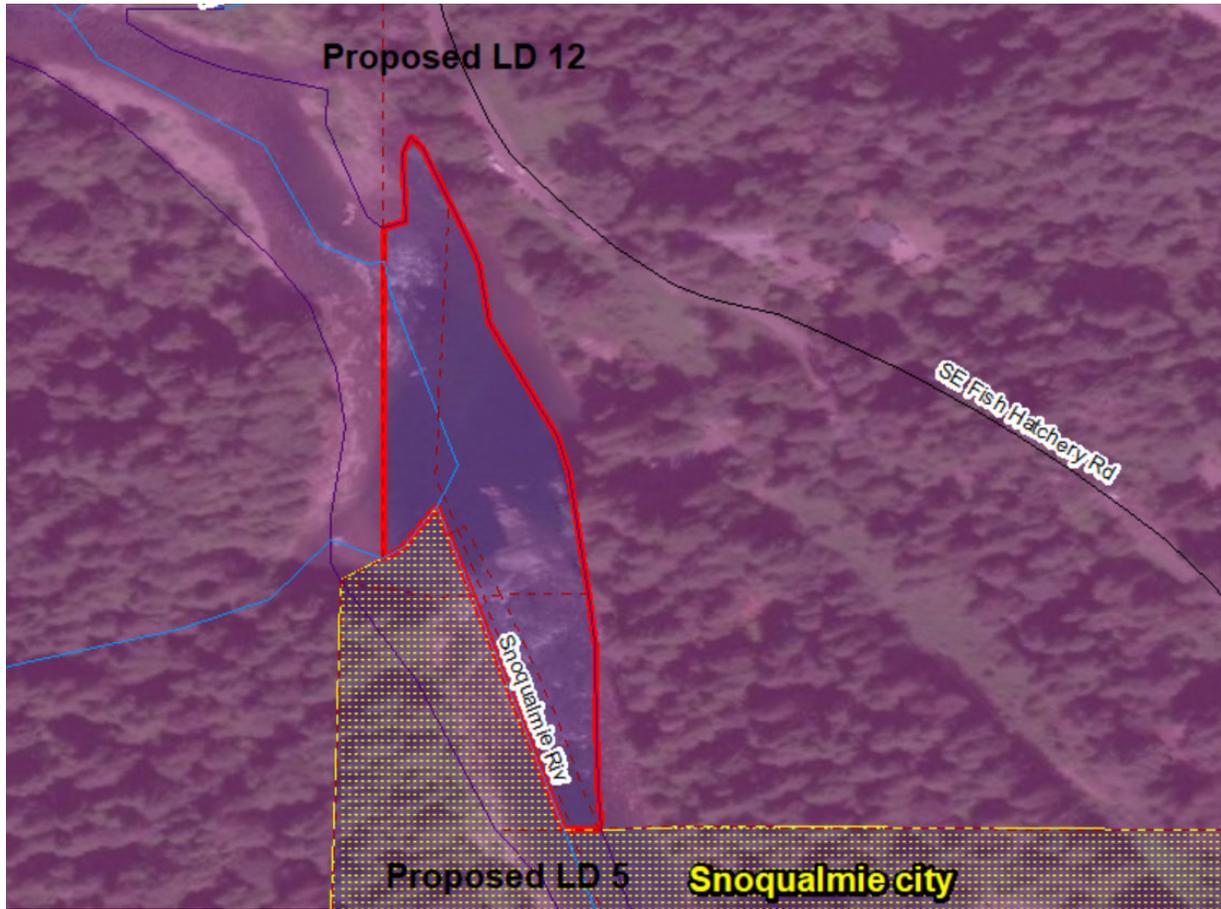


1 A possible remedy is to move block 530330327044025 (population zero) from LD 5 to  
2 LD 12.

3 15. King County: LD 5/LD 12, city limits of Snoqualmie:



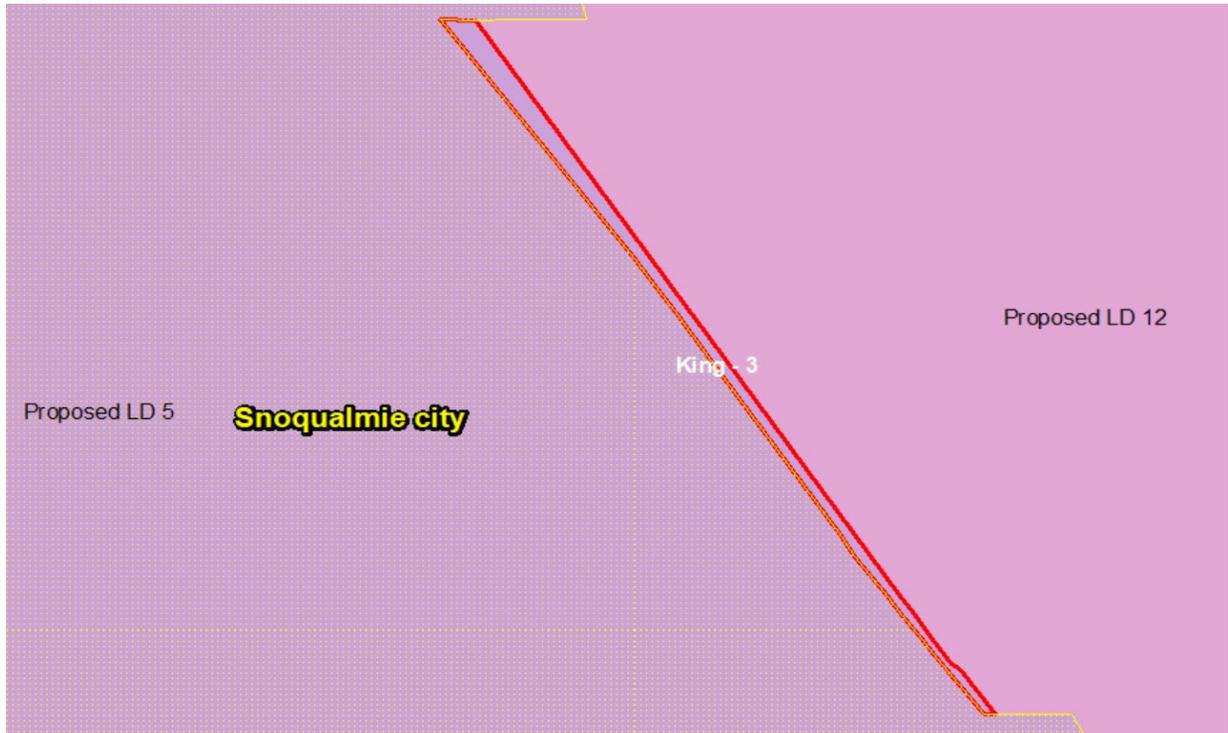
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A possible remedy is to move blocks 530330326033001 and 530330328001053 (total population zero) from LD 5 to LD 12.

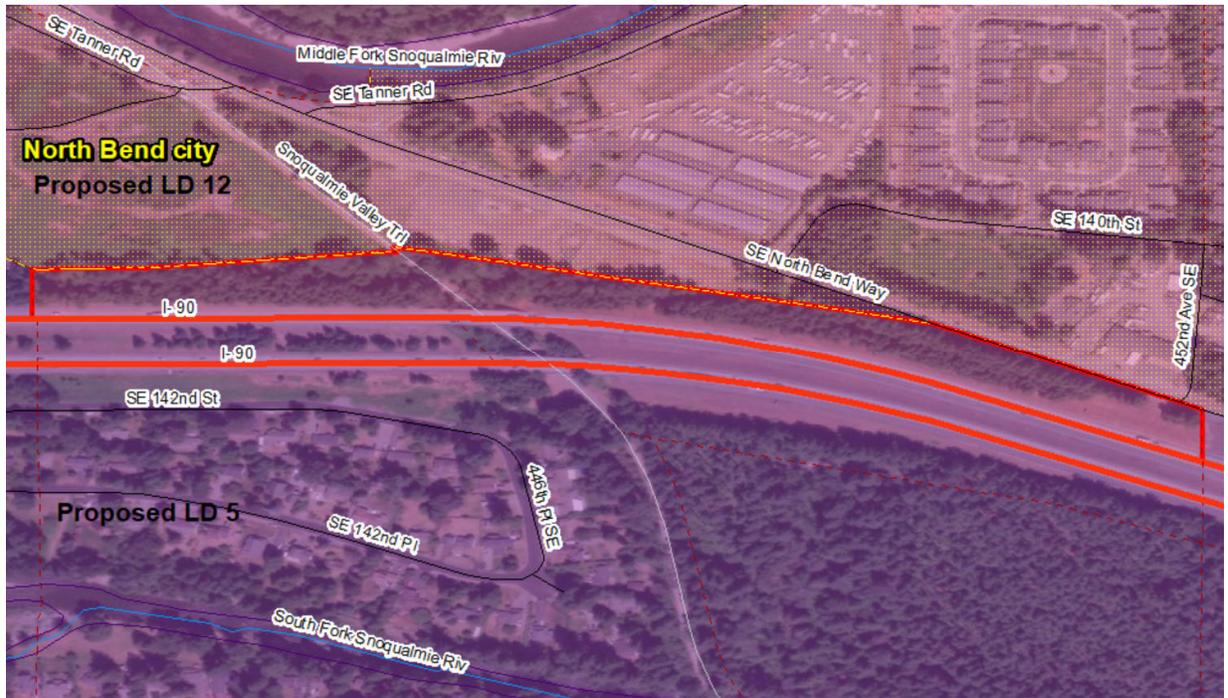
16. King County: LD 5/LD 12, city limits of Snoqualmie:

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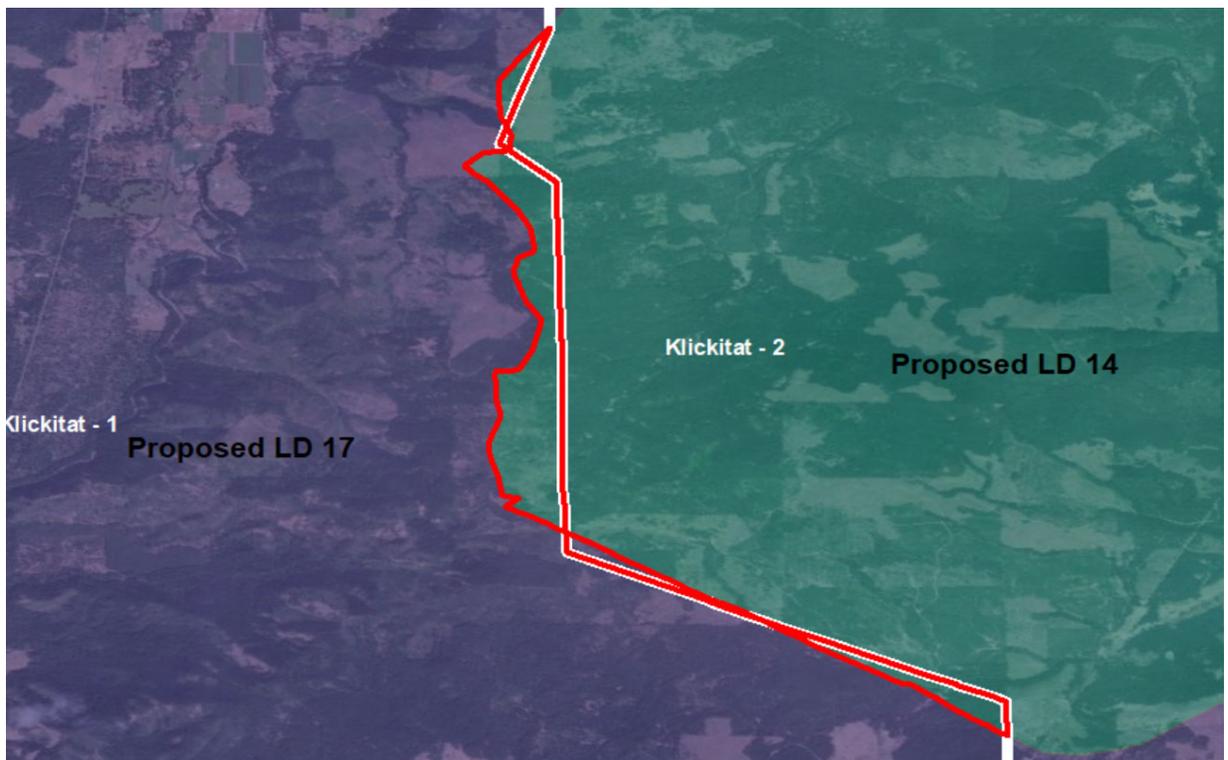
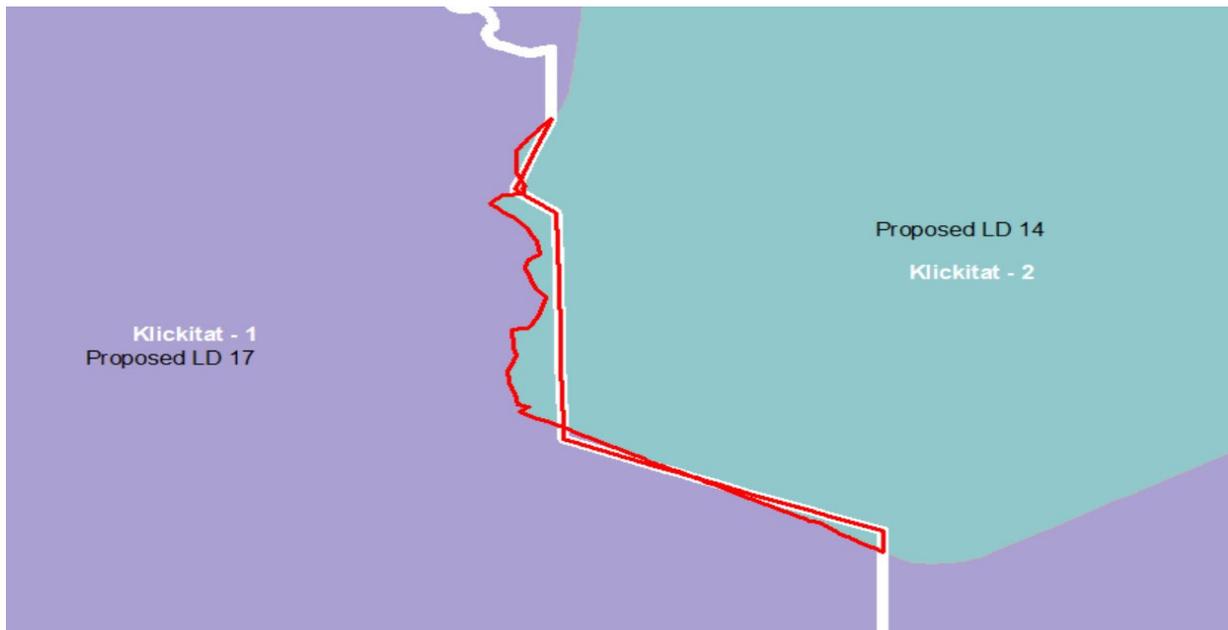
A possible remedy is to move blocks 530330327032002 and 530330328001041 (total population zero) from LD 5 to LD 12.

17. King County: LD 5/LD 12, city limits of North Bend:



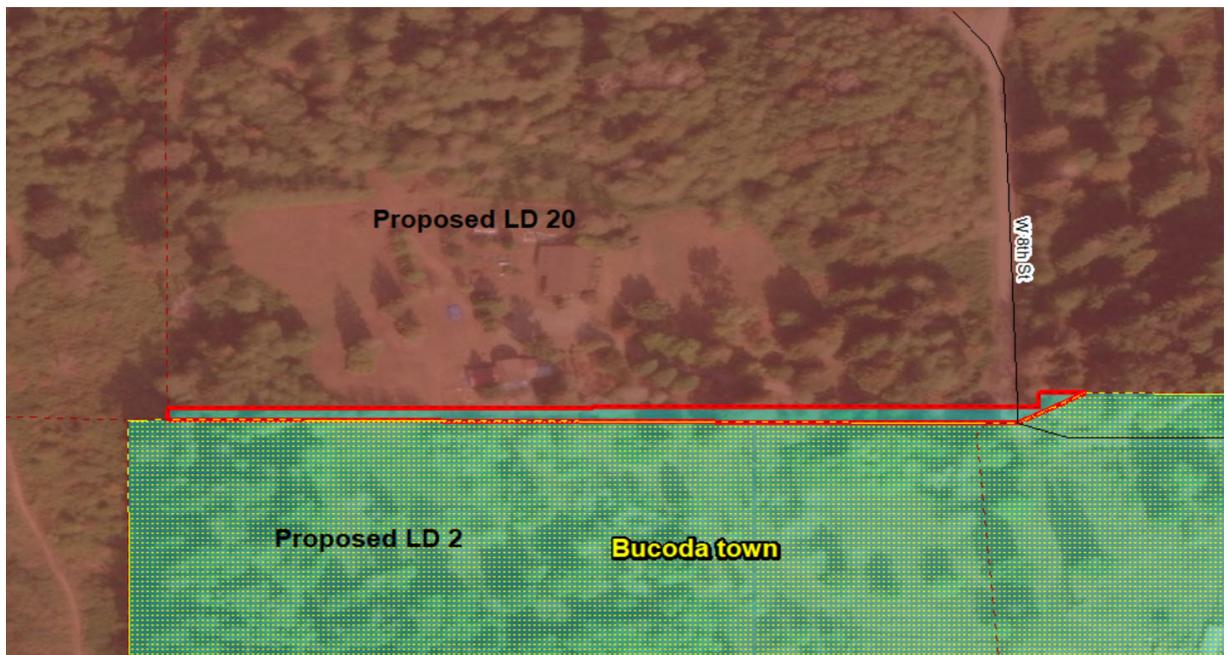
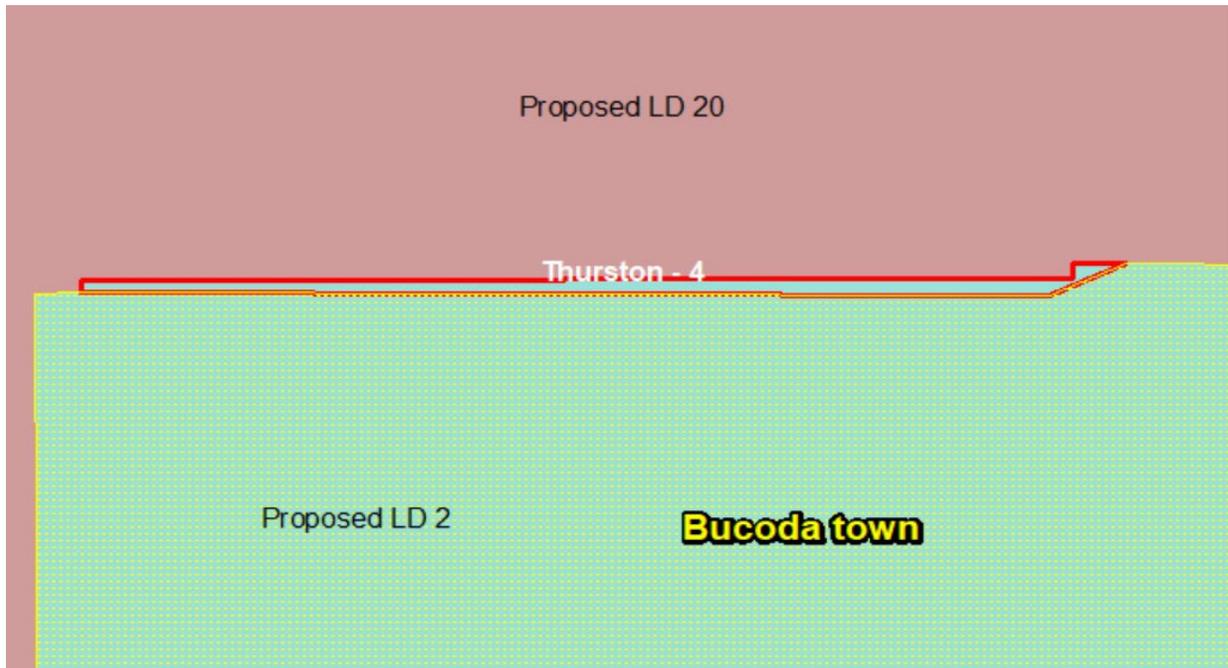
A possible remedy is to move block 530330327041013 (population zero) from LD 12 to LD 5.

1 18. Klickitat County: five zero-population polygons created by the interweaving of  
2 the proposed LD 14/LD 17 boundary with the boundary between Klickitat County  
3 Commissioner Districts 1 and 2:

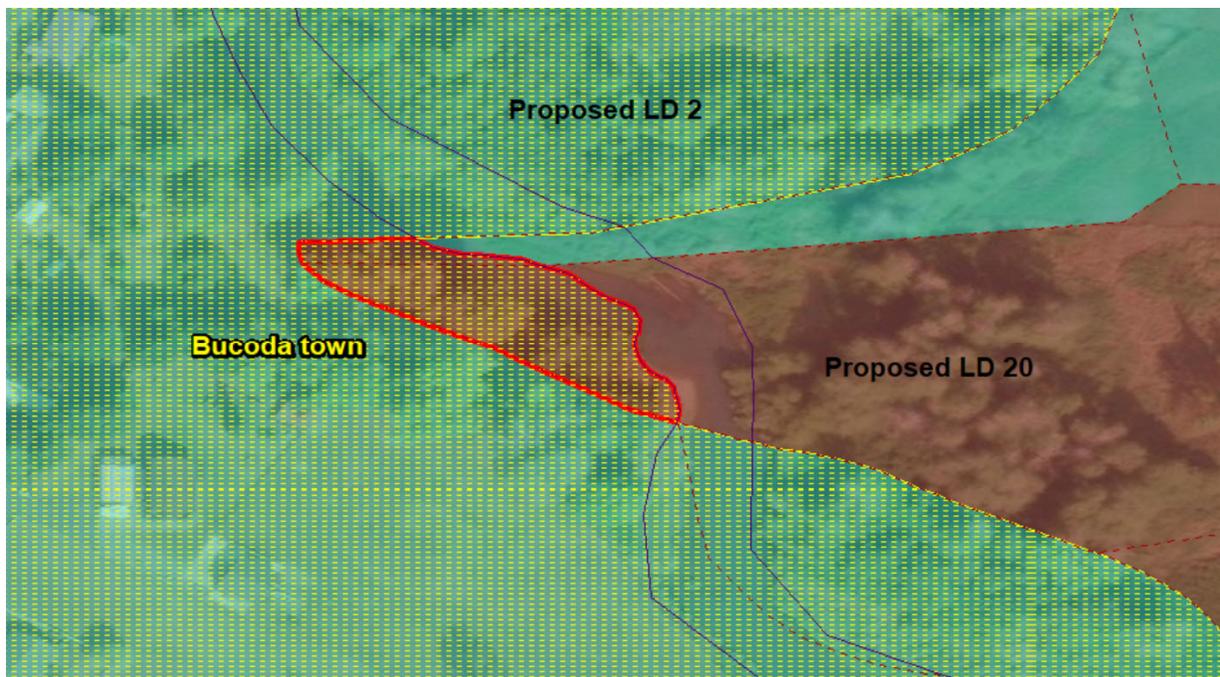
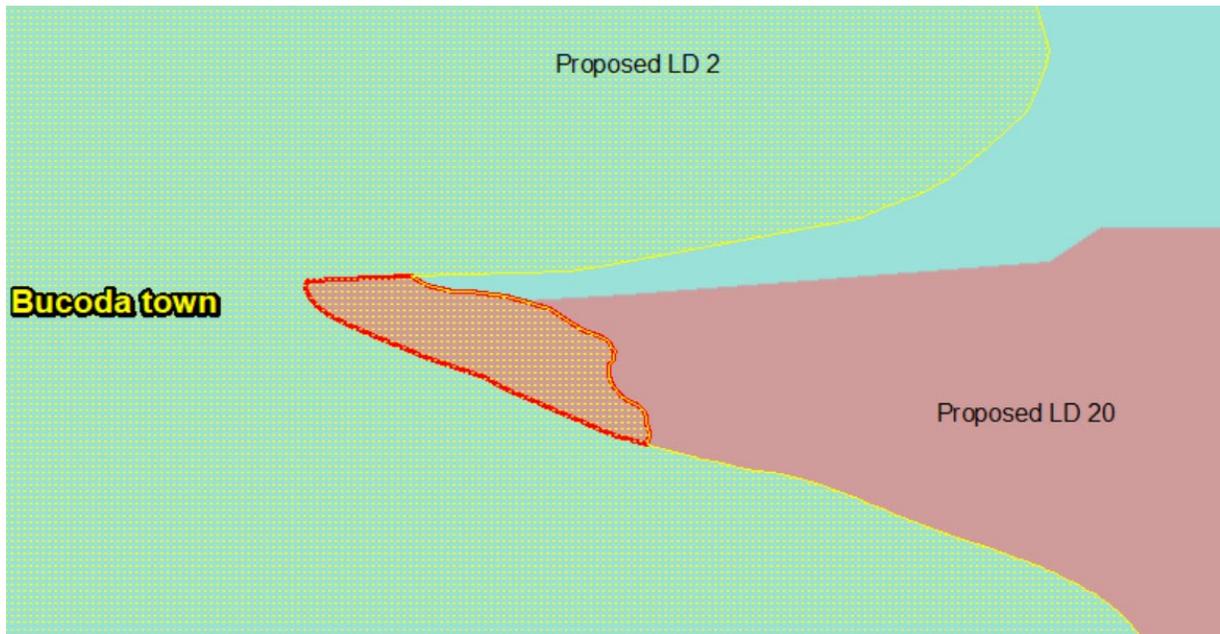


1 I have not identified a good solution for this. Plaintiffs' proposed line is the federally  
2 recognized boundary of the Yakama Nation reservation.

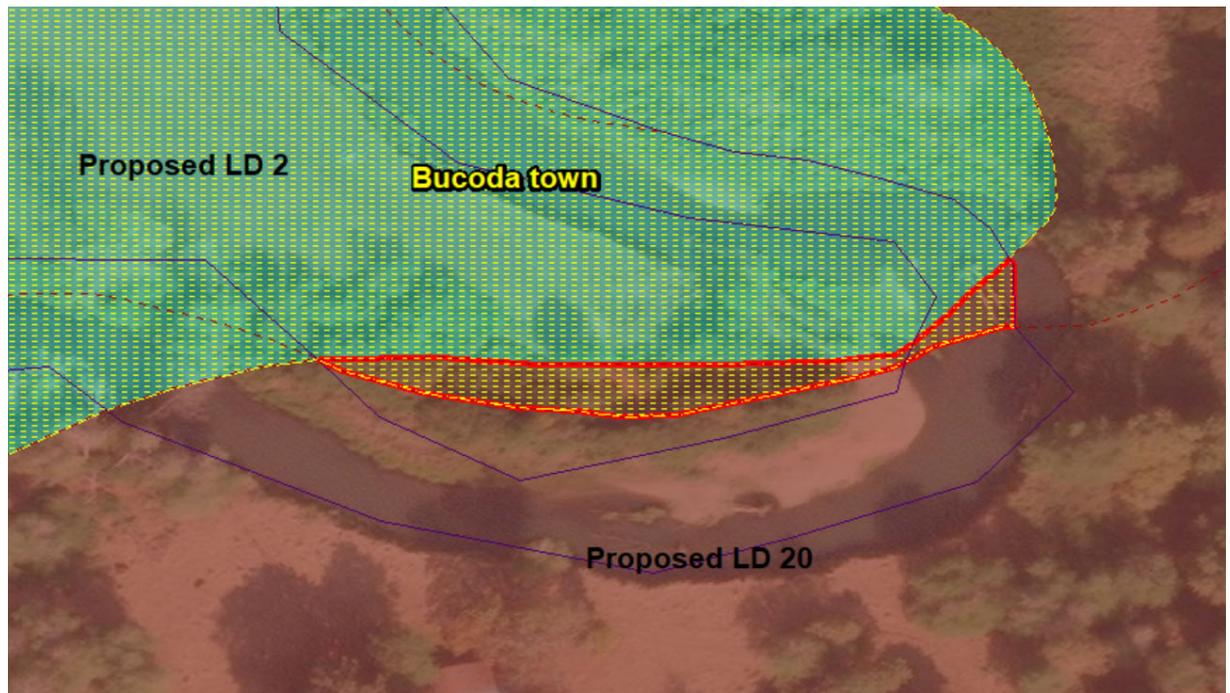
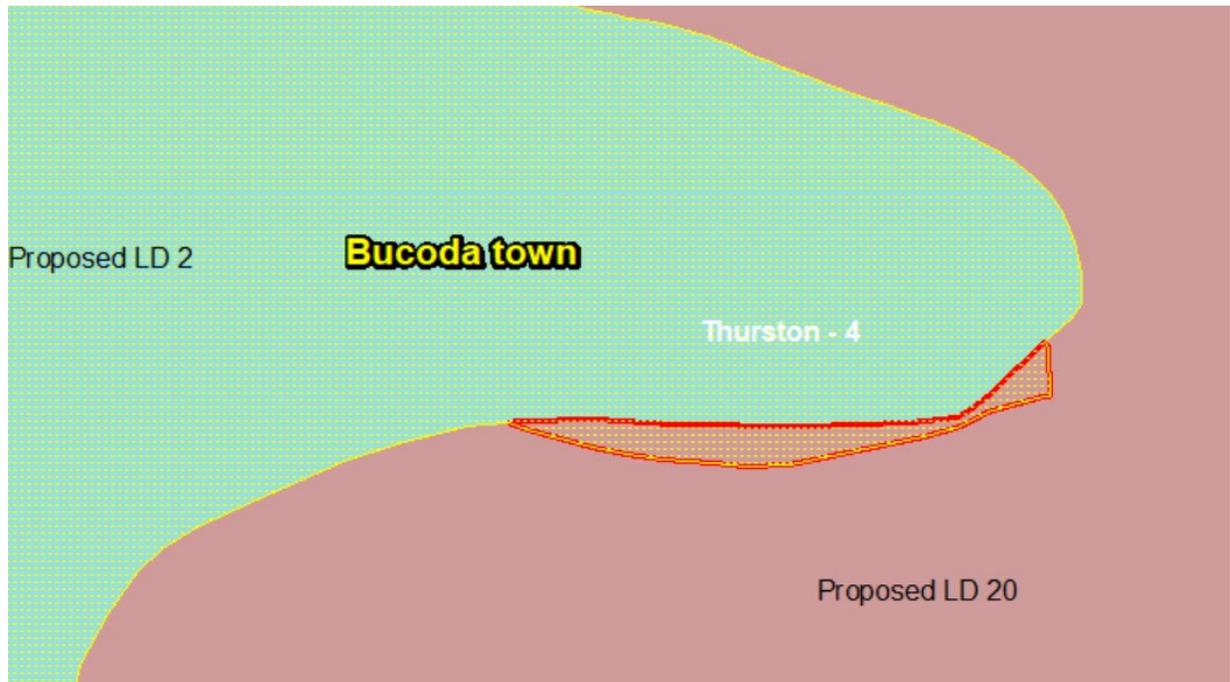
3 19. Thurston County: LD 2/LD 20, town limits of Bucoda (five zero-population  
4 polygons):



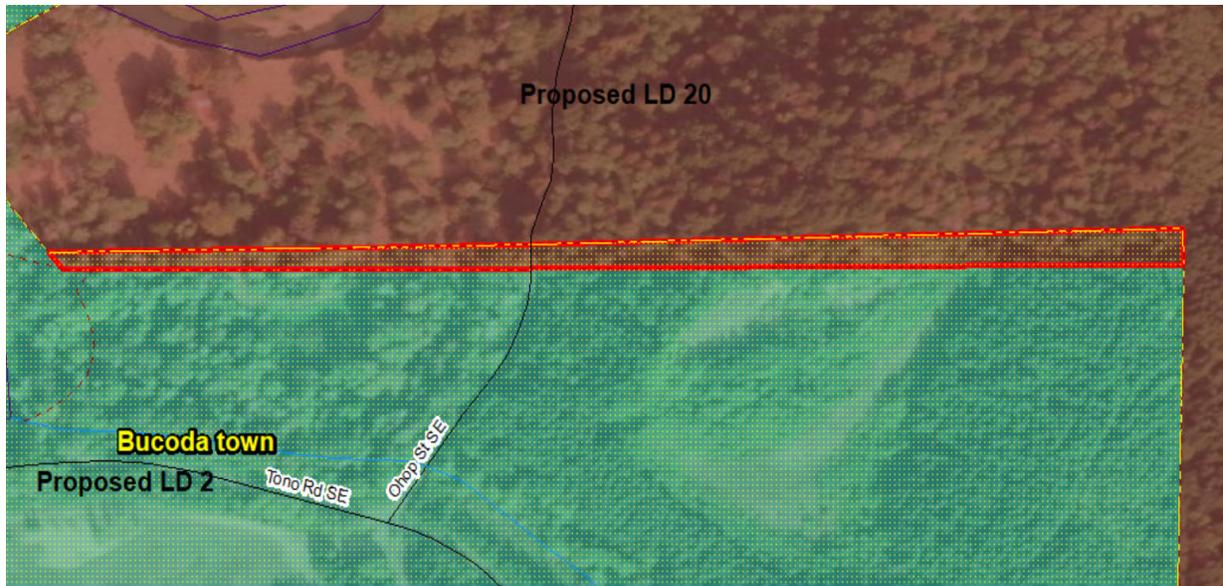
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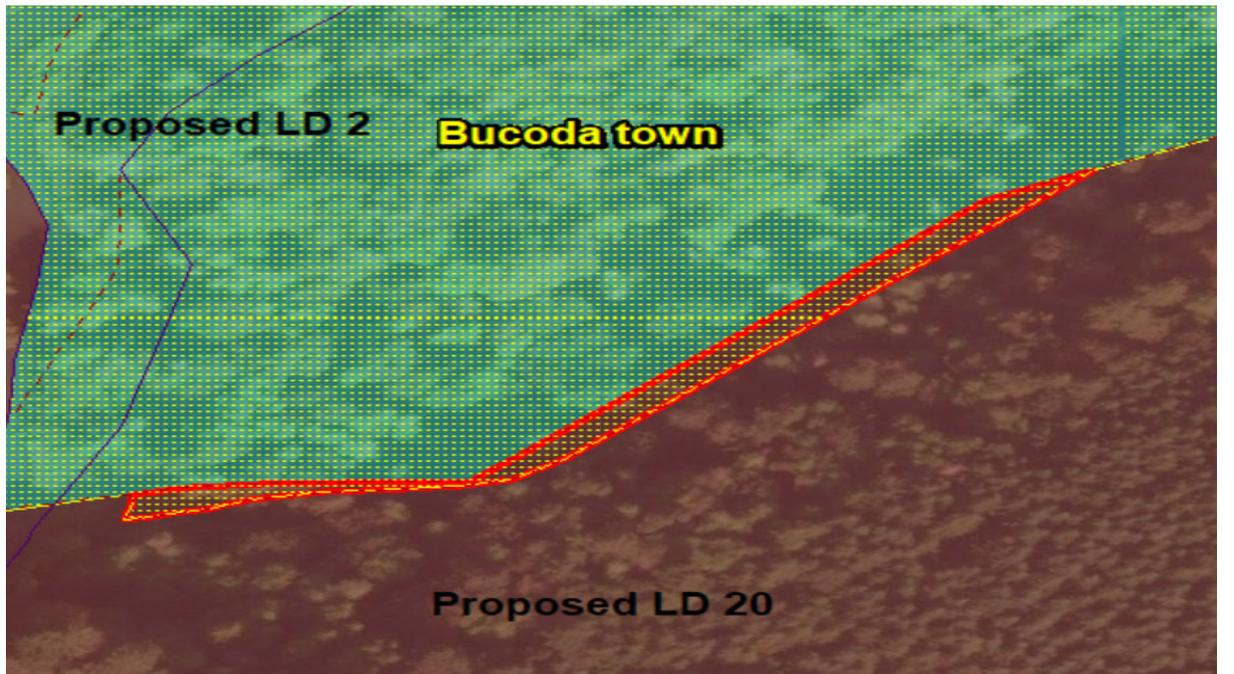
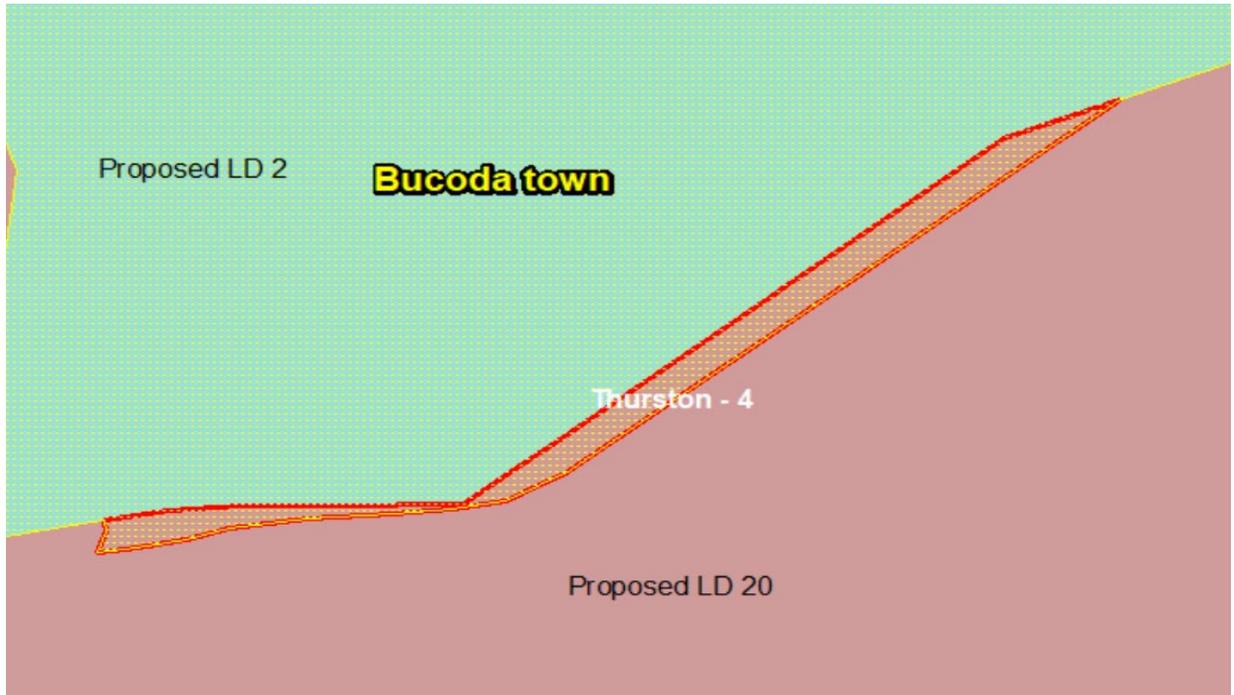
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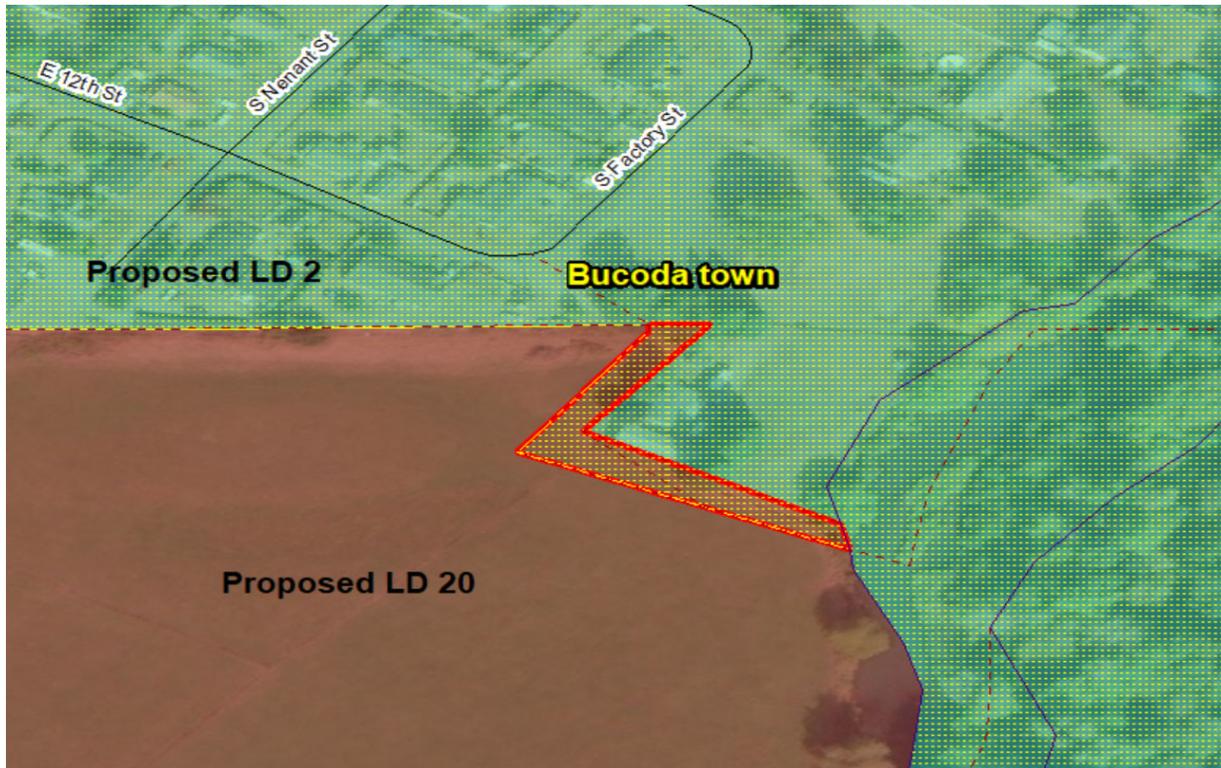
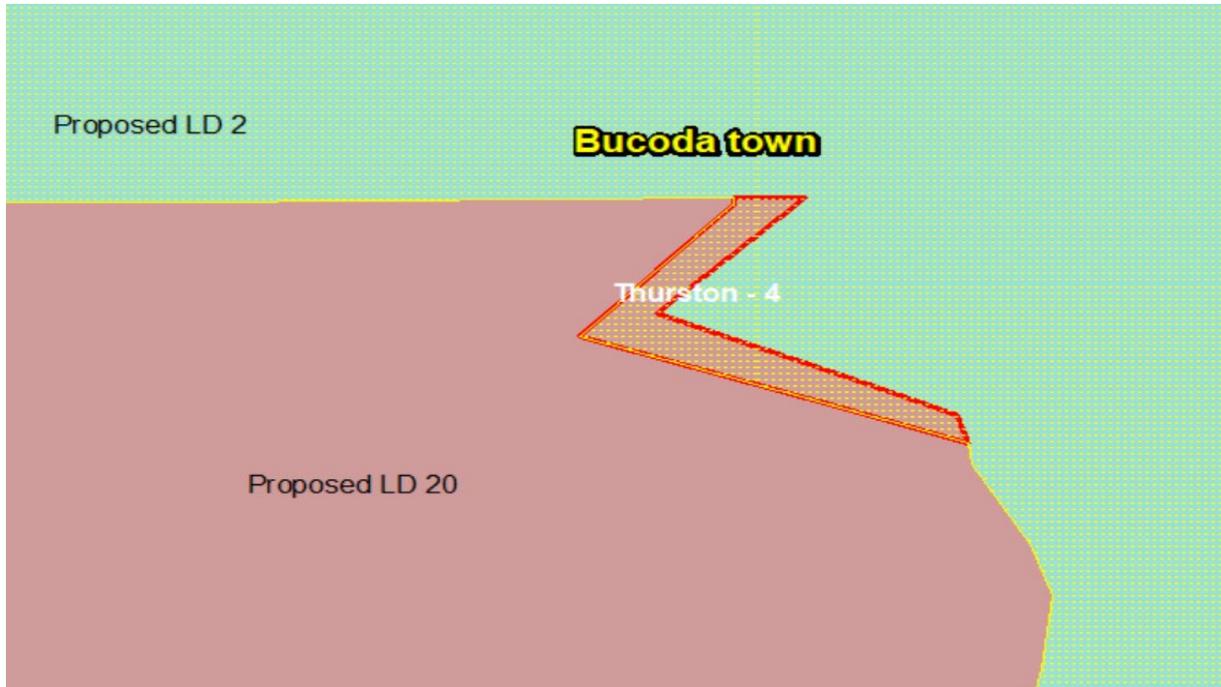


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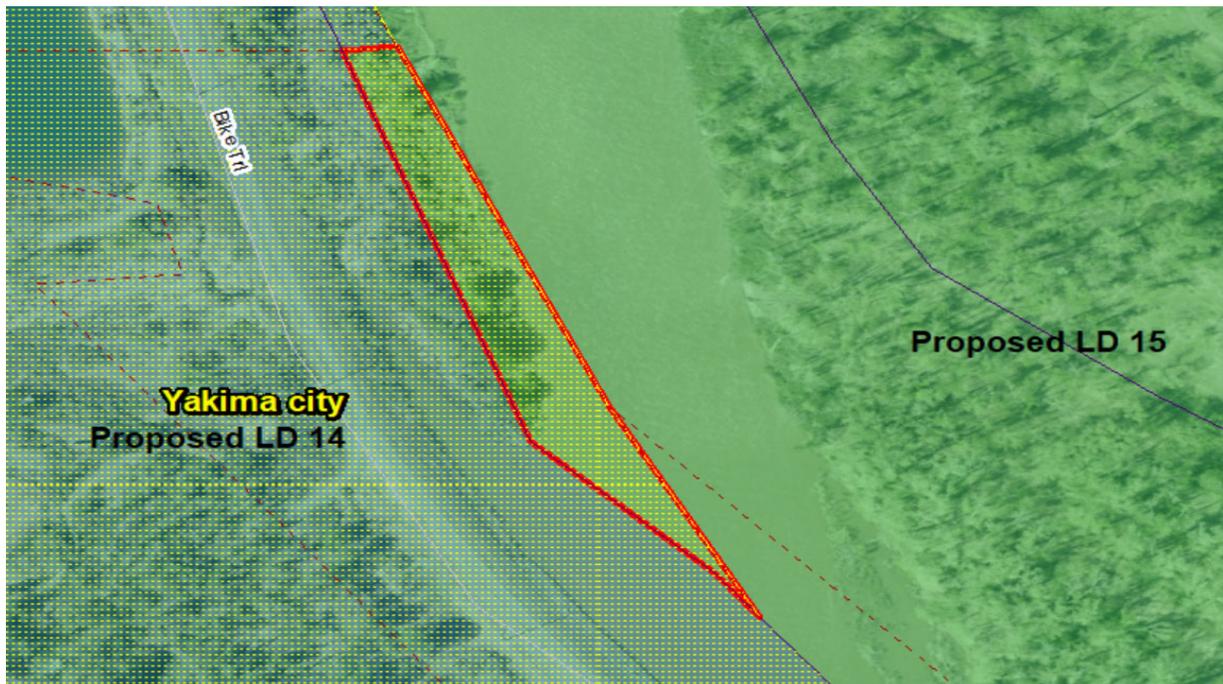
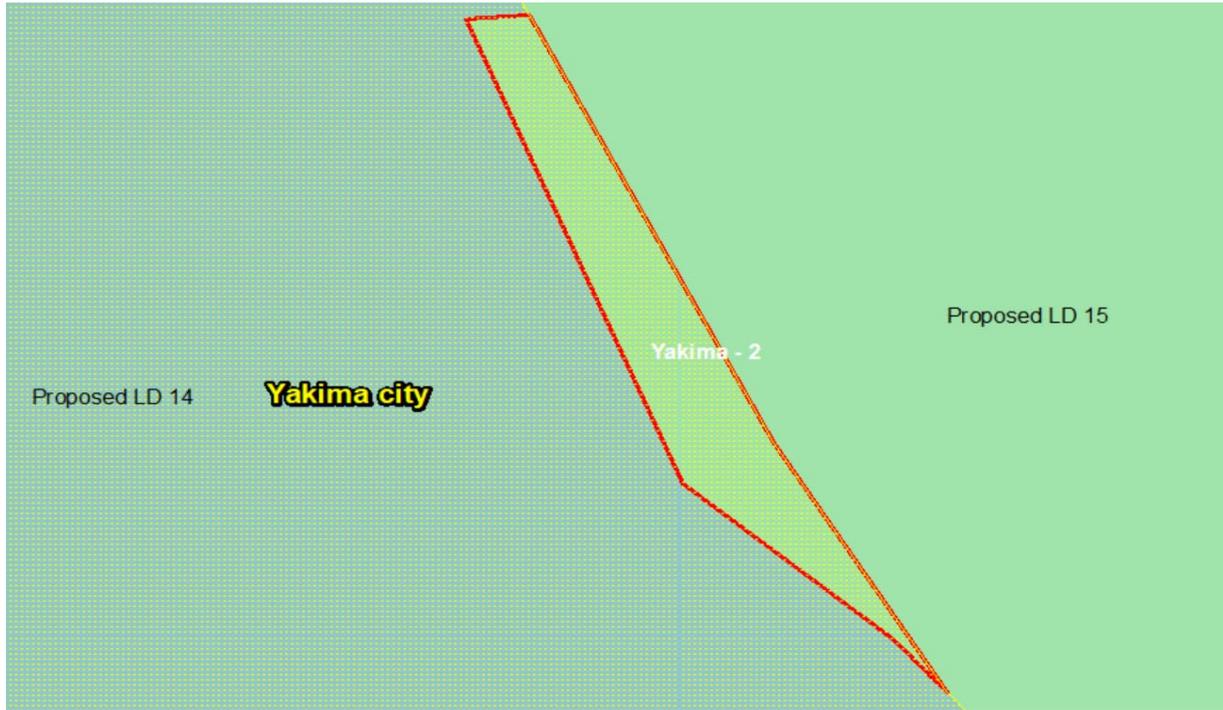
A possible remedy is to move block 530670126201015 (population zero) from LD 2 to LD 20; move blocks 530670126205018, 530670126205032, 530670126205071, 530670126205028, 530670126205038 (total population zero) from LD 20 to LD 2.

1           20.     Thurston County: LD 2/LD 20, town limits of Bucoda (enumerated population 8,  
2 but from aerial photos it looks like the population is really located in an adjacent block):



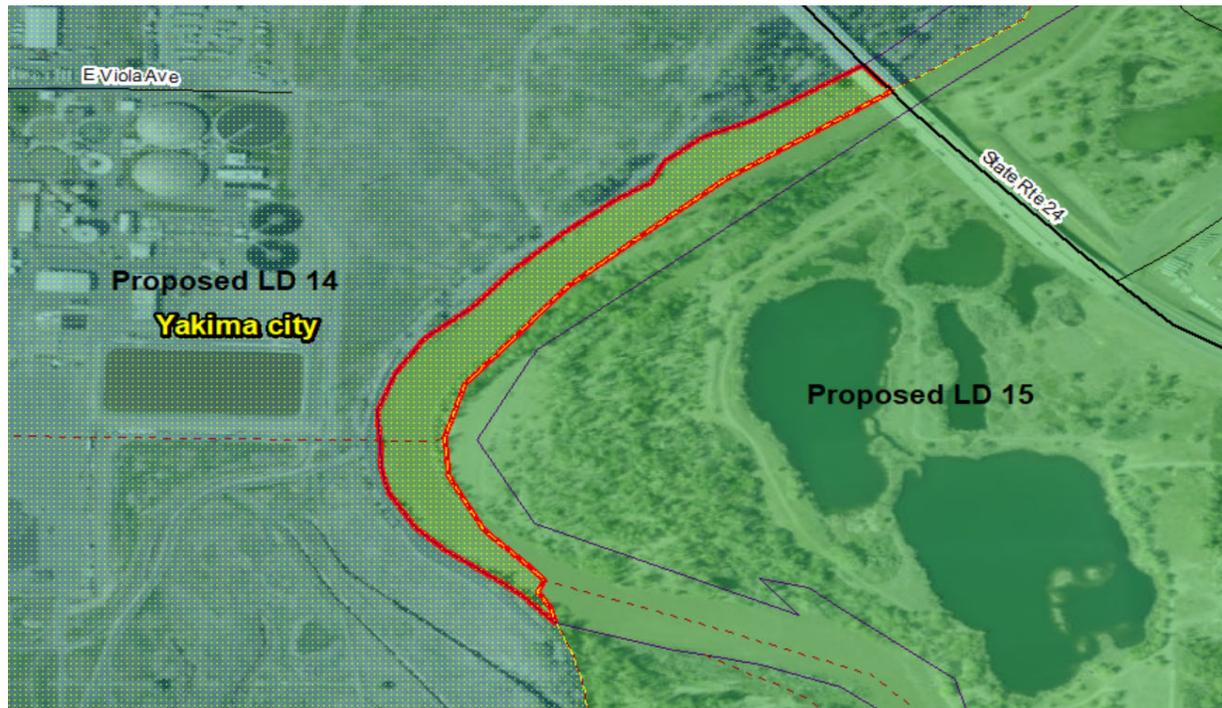
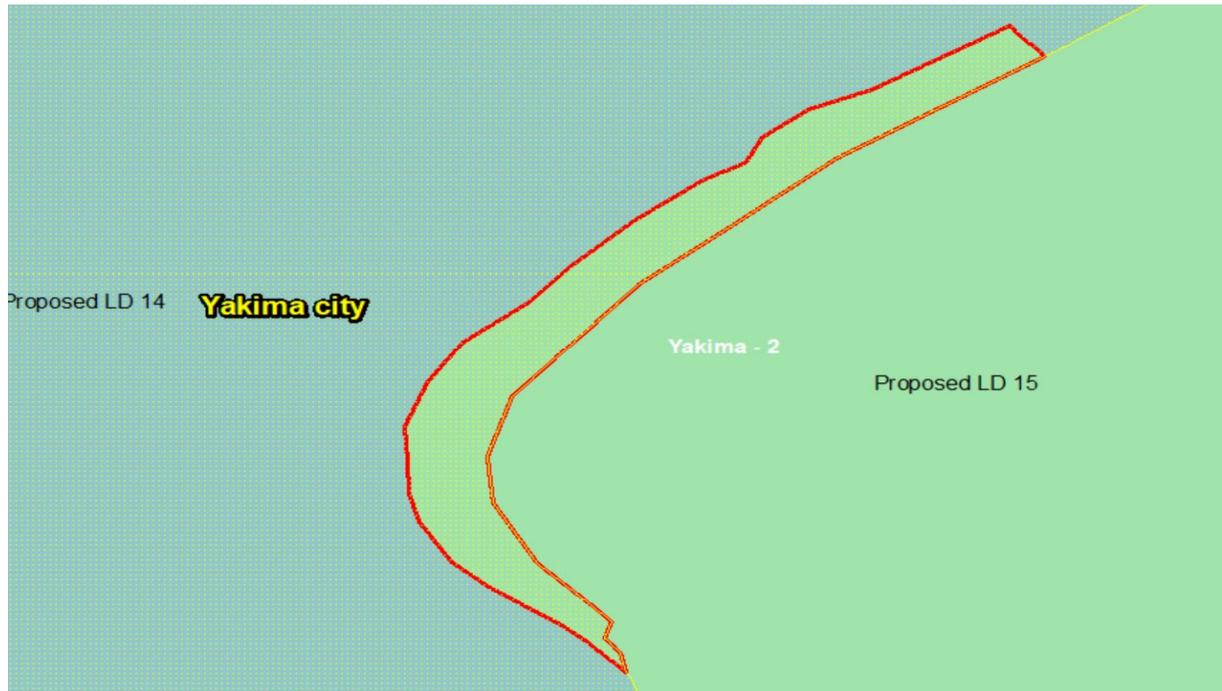
1 A possible remedy is to move block 530670126205057 (population supposedly 8) from  
2 LD 20 to LD 2.

3 21. Yakima County: LD 14/LD 15, city limits of Yakima:



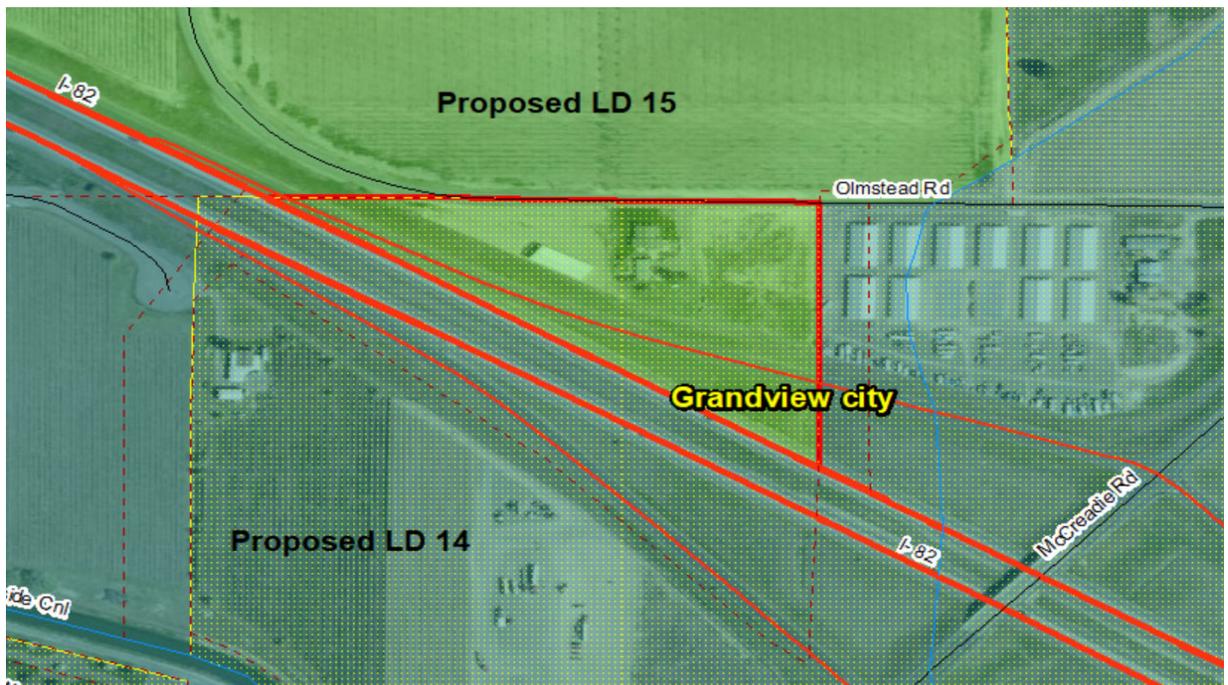
1 A possible remedy is to move block 530770016022016 (population zero) from LD 15  
2 to LD 14.

3 22. Yakima County: LD 14/LD 15, city limits of Yakima:



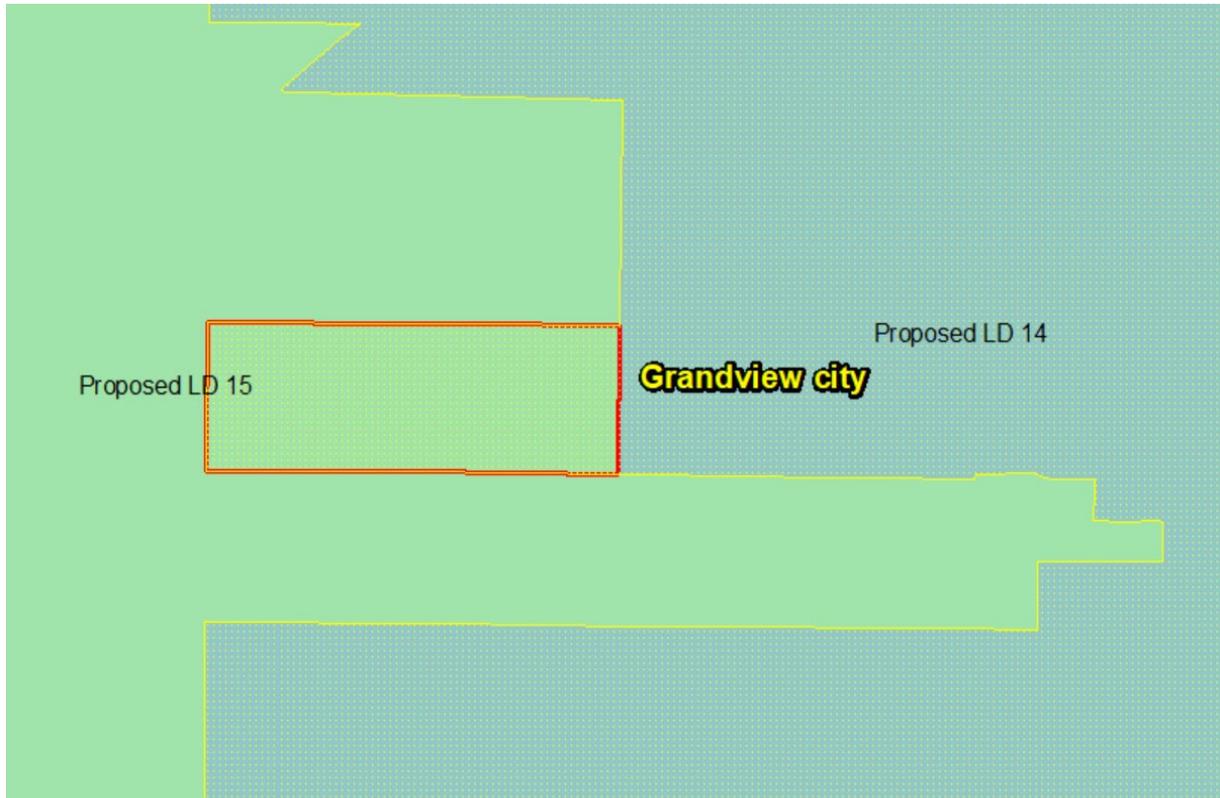
1 A possible remedy is to move blocks 530770017021015 and 530770017021018 (total  
2 population zero) from LD 15 to LD 14.

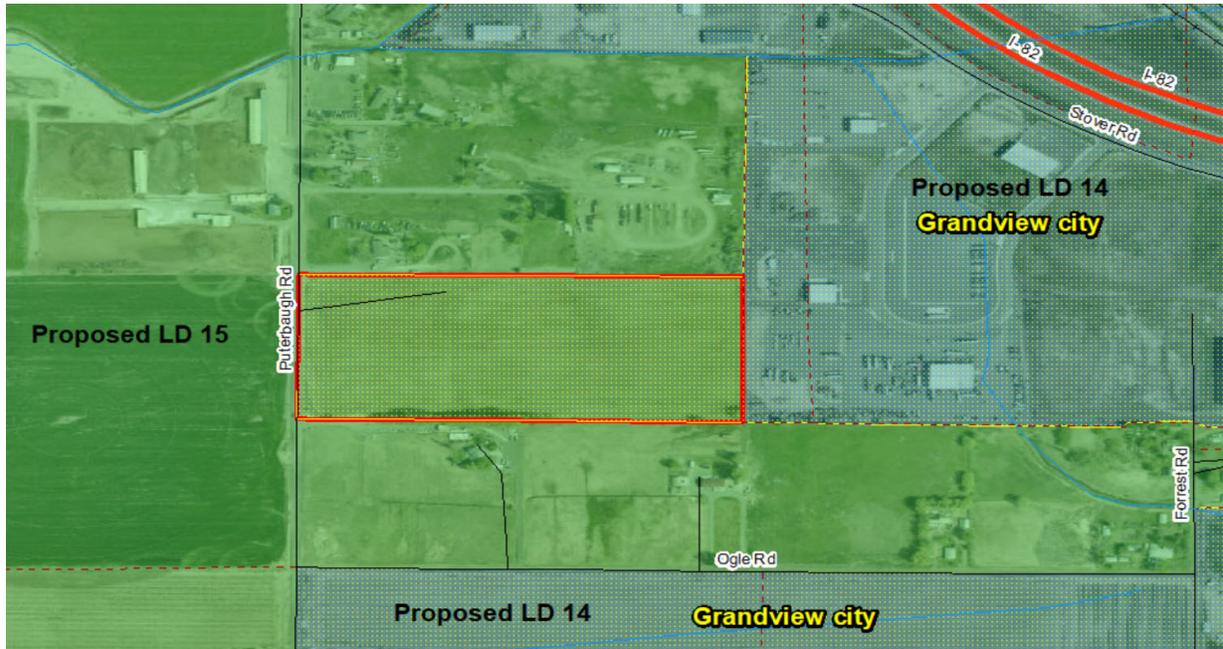
3 23. Yakima County: LD 14/LD 15, city limits of Grandview as modified by  
4 Ordinance 2022-12, effective 8/29/2022:



1 A possible remedy is to move the portion of block 530770018013012 currently lying  
2 within the city limits of Grandview from LD 15 to LD 14 (the annexation survey recorded two  
3 people in one dwelling in the area to be moved, and there is one voter registered there).

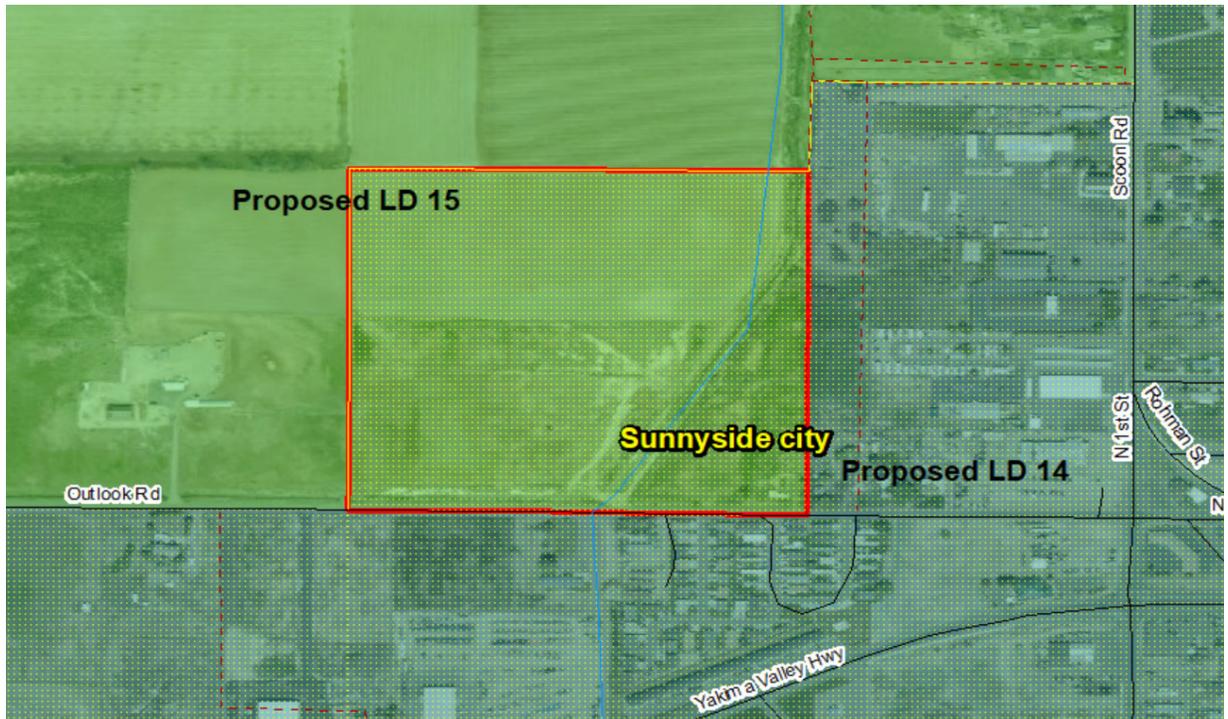
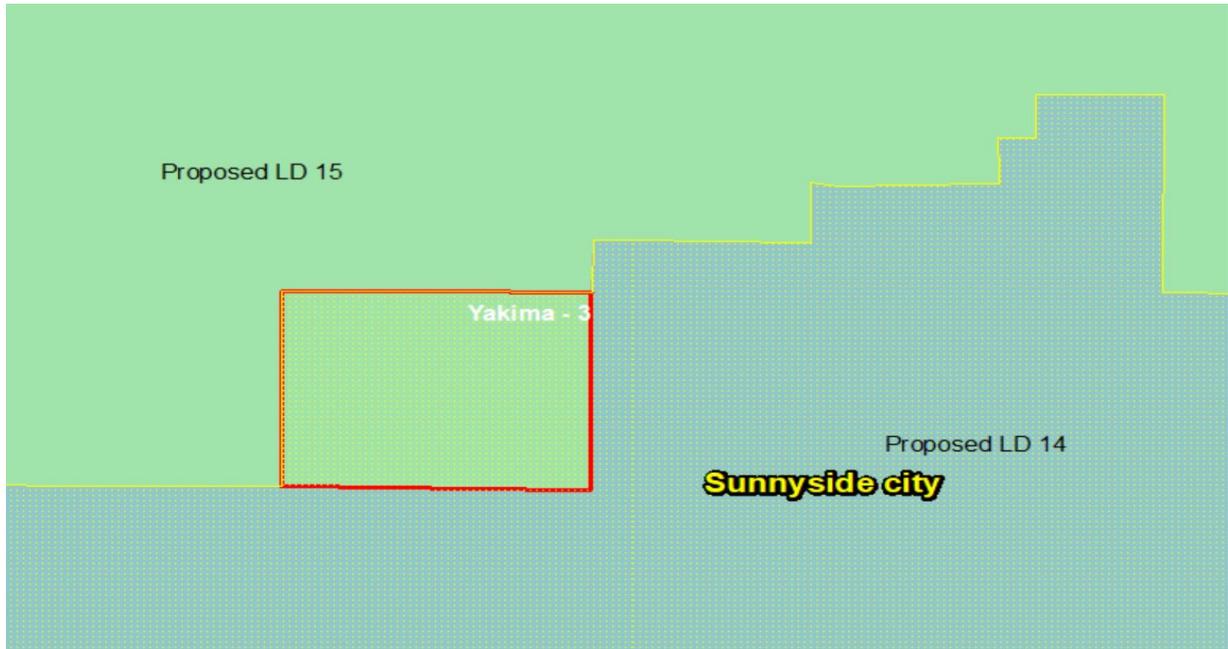
4 24. Yakima County: LD 14/LD 15, city limits of Grandview as modified by  
5 Ordinance 2021-13, effective 10/4/2021:





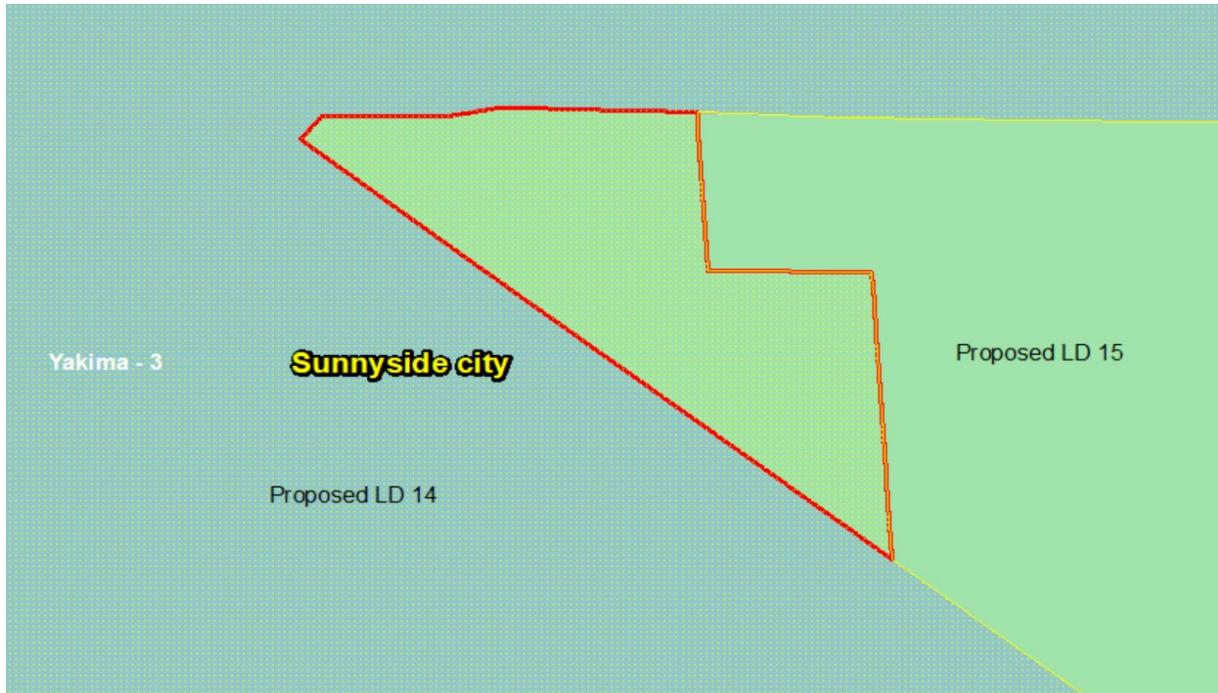
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12 A possible remedy is to move the portion of block 530770018012077 currently lying  
13 within the city limits of Grandview from LD 15 to LD 14. The annexation survey recorded no  
14 population in the annexed area.

15 25. Yakima County: LD 14/LD 15, city limits of Sunnyside as modified by Ordinance  
16 2020-06A, effective 8/10/2020:



24 A possible remedy is to move the portions of blocks 530770020042004 and  
 25 530770020042005 currently lying within the city limits of Sunnyside from LD 15 to LD 14.  
 26 The annexation survey recorded two people in one dwelling in the area to be moved.

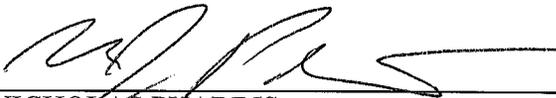
1           26.    Yakima County: LD 14/LD 15, city limits of Sunnyside as modified by  
2 Ordinance 2021-06, effective 6/21/2021:



1 A possible remedy is to move the portion of block 530770018011075 currently lying  
2 within the city limits of Sunnyside from LD 15 to LD 14. The annexation survey recorded two  
3 people in one dwelling in the area to be moved, and there are two voters registered there.

4  
5 I declare under penalty of perjury under the laws of the State of Washington and the  
6 United States that the foregoing is true and correct.

7 SIGNED this 23rd day of February 2024, at Olympia, Washington.

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11 NICHOLAS PHARRIS  
12 VoteWA Support Lead

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**DECLARATION OF SERVICE**

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court’s CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 23rd day of February 2024, at Olympia, Washington.

*s/ Leena Vanderwood*  
Leena Vanderwood  
*Paralegal*  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100  
(360) 753-6200  
Leena.Vanderwood@atg.wa.gov

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