

October 21, 2022

Sent via email

Florence County Voter Registration & Election Board
219 Third Loop Road
Florence, SC 29505
jyoung@florenceco.org

Subject: Additional Early Voting Centers in Florence County

Dear Director Young and Members of the Voter Registration Staff:

The NAACP Legal Defense and Educational Fund, Inc. (“LDF”) writes to encourage you to add additional early voting centers for the November 2022 election in Florence County, and to do so in locations that are more accessible for Black voters.

South Carolina law authorizes counties, including Florence County, to designate up to seven early voting centers for an election.¹ In doing so, counties “must consider geography, population, and ADA compliant accessibility.”² In addition, they “must distribute the locations throughout the county to maximize accessibility for all voters in the county to the greatest extent possible.”³ Under each of these criteria, as well as considerations of fairness and racial equity, Florence County’s current early voting plans falls short.

According to the 2020 Census, Florence County is home to 136,504 residents,⁴ who live across a geographical expanse of about 800 square miles.⁵ 82,859 of Florence County’s residents are currently registered to vote.⁶ However, for the November 2022 election, Florence County has thus far identified only three early voting centers.⁷ This decision would force each location to serve an average of 27,619 registered voters, over an average of 266 square miles. It

¹ S.C. Code § 7-13-25(D).

² *Id.* § 7-13-25(G)(1).

³ *Id.*

⁴ See U.S. Census Bureau, *2020 Decennial Census*.

⁵ See U.S. Census Bureau *Quick Facts*, available at

<https://www.census.gov/quickfacts/fact/table/florencecountysouthcarolina,berkeleycountysouthcarolina,SC/POP010220>

⁶ S.C. Elec. Comm’n. *Early Voting* <https://scvotes.gov/voters/early-voting/> (select “Florence” in drop-down menus) (last visited Oct. 19, 2022).

⁷ Florence County, S.C., *Board of Voter Registration and Elections of Florence County*, <https://www.Florencecountysc.gov/vote/index.html> (last visited Oct. 19, 2022).

appears likely to result in long lines and crowding at the polls.⁸ As a matter of efficient election administration and sound governmental policy, therefore, Florence County’s decision to designate only three early voting centers is highly questionable.

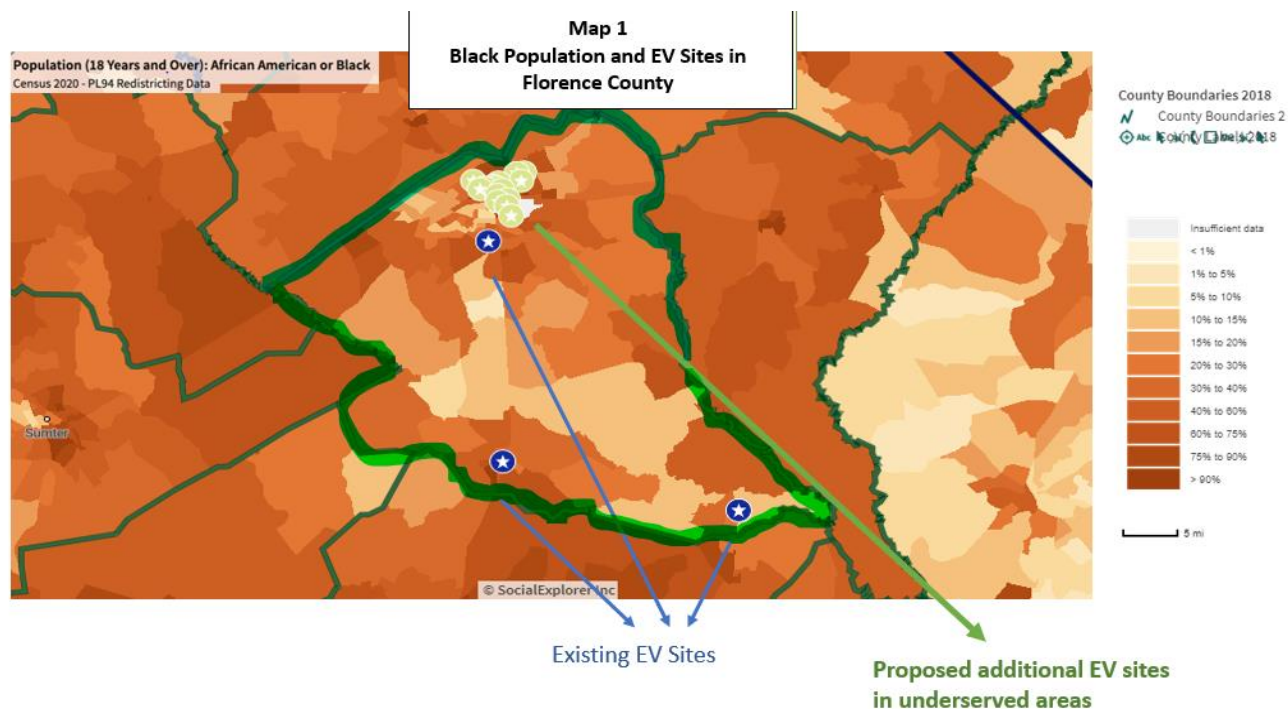
Moreover, the three early voting centers that Florence County has designated to date⁹ do not appear to be equally accessible for the County’s communities of Black voters, raising concerns that Black voters in Florence County may be denied an equal opportunity to participate in the political process during early voting in the November 2022 election.¹⁰

As Map 1 below reveals, the three early voting centers identified thus far by Florence County are largely inaccessible to Black voters. The Black population is densely concentrated in the north of Florence County. Only one of the three early voting centers is nearby—though on the southern edge of the town Quinby. The remaining two centers are at the southern edge of Florence County.

⁸ See Hannah Klain, Kevin Morris, Max Feldman, and Rebecca Ayala, *Waiting to Vote: Racial Disparities in Election Day Experiences* 10, Brennan Center for Justice (June 3, 2020), <https://www.brennancenter.org/our-work/research-reports/waiting-vote> (examining nationwide data from the 2018 election and concluding that “voters in counties with the most voters per polling place waited more than twice as long as voters in counties with the fewest voters per polling place”); see also Christopher Famighetti, *Long Voting Lines: Explained* 6, Brennan Center for Justice, https://www.brennancenter.org/sites/default/files/analysis/Long_Voting_Lines_Explained.pdf (reporting that “the strongest predictor of delays is the number of eligible voters each center serves”).

⁹ The three sites are: County Voter Registration and Elections Office, located at 219 Third Loop Rd; The Continuum, located at 208 W Main Street; and Johnsonville Library, located at 242 S Georgetown Highway; see *supra* note 7.

¹⁰ See 52 U.S.C. § 10301(b) (explaining that Section 2 of the Voting Rights Act of 1965 is violated if “the political processes leading to nomination or election in the State or political subdivision are not equally open to participation by members of a [racial or language minority group] in that its members have less opportunity than other members of the electorate to participate in the political process and to elect candidates of their choice”).



One early voting center is insufficient to serve voters in these northern communities, and traveling to the other two voting sites would be extremely burdensome. For instance, The Continuum is approximately 35 miles from Quinby, while Johnsonville Library is 40 miles away. Neither of these sites designated by Florence County adequately or equally serves Black voters in these communities.

The inequity in access created by Florence County’s initial early voting plan can and should be addressed. As discussed above, South Carolina law gives you explicit statutory authority to designate up to seven early voting centers.¹¹ And you are under an obligation, as discussed above, to “consider geography” and “population” in designing your early voting plan, in order to appropriately “distribute the locations throughout the county to maximize accessibility for all voters[.]”¹²

Therefore, to provide reasonable and fair accessibility to early voting for Florence County’s Black voters, and to more equitably distribute locations throughout the county, we urge you to designate four additional early voting centers in the northern part of Florence County. There are numerous viable options that you could explore for these locations, including the following:

¹¹ S.C. Code § 7-13-25(D).

¹² *Id.* § 7-13-25(G)(1).

1. House of God Church, 115 Wilson Rd, Florence, SC 29506
2. Williams Middle School, 1119 N Irby St, Florence, SC 29501
3. North Vista Elementary School, 1100 N Irby St, Florence, SC 29501
4. Wilson High School, 1411 E Old Marion Hwy, Florence, SC 29506
5. Monumental Missionary Baptist Church, 918 Oakland Ave, Florence, SC 29506
6. Mount Zion AME Church, 1305 E Cheves St, Florence, SC 29506
7. SC Church of God by Faith, 1051 Clement St, Florence, SC 29501
8. Carver Street Baptist Church, 801 Dunbar St, Florence, SC 29501
9. West Florence Fire Department - Station #2 & Training Center, 1515 W Milwaukee Dr, Florence, SC 29501
10. Florence Fire Dept. Station 2, 250 E Marion St, Florence, SC 29506
11. Prayer Tabernacle 'The Place of Refuge,' 1110 Walnut St, Florence, SC 29506
12. Greater Zion Tabernacle Apostolic Church, 265 S Church St, Florence, SC 29506
13. Mc Laurin Elementary School, 1400 McMillian Ln, Florence, SC 29506
14. Quinby Baptist Church, 950 E Ashby Rd, Florence, SC 29506
15. Quinby United Methodist Church, 1247 E Ashby Rd, Quinby, SC 29506

We urge you to act promptly in addressing this inequity. We understand that the decision to establish early voting centers involves a nuanced set of considerations regarding funding, accessibility, and compliance with state law. But it is important for you to act to address the access disparities we have identified above. This matter is urgent—as you know, early voting begins on Monday, October 24. To discuss these recommendations further, please feel free to contact Alaizah Koorji at akoorji@naacpldf.org.

Sincerely,

/s/ Alaizah Koorji

Amir Badat, Manager, Prepared to Vote and Voting Rights Defender Projects

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