



August 28, 2026

Tarrant County Commissioners Court
Tarrant County Administration Building
100 E. Weatherford, Room 502A
Fort Worth, Texas 76196

RE: Tarrant County's Proposed Elimination of Poll Sites

Dear Tarrant County Commissioners:

The NAACP Legal Defense and Educational Fund, Inc. (the “Legal Defense Fund” or “LDF”), Texas Civil Rights Project, the Asian American Legal Defense and Education Fund (“AALDEF”), Delta Sigma Theta Sorority, Inc., the Barbara Jordan Leadership Institute, Campaign Legal Center, the ACLU of Texas, and Common Cause Texas write to express our concern about the Tarrant County Commissioners Court’s proposal to eliminate a significant number of Election Day and early voting poll sites for the November 2026 general election.¹ On August 4, 2026, the Commissioners Court considered a proposal to combine election precincts in order to eliminate 140 of the county’s 316 Election Day poll sites (a 44% reduction) and eight of the county’s fifty early voting poll sites (a 16% reduction), which was only tabled after hours of opposing testimony from residents.² On September 1, the Commissioners Court will again hear a proposal to reduce poll sites.³ This time, the Commissioners Court is proposing eliminating 92 of the county’s 316 Election Day poll sites (a 29% reduction).⁴ Cutting the number of poll sites,

¹ Texas Civil Rights Project previously wrote to the Commissioners Court on July 31, 2026, laying out the apparent illegality of the proposal shared August 4. *See* Letter from Tex. C.R. Project to the Tarrant Cnty. Comm’rs & Cnty. Judge (July 31, 2026); Alanna Quillen, *Public Kicked Out of Meeting Before Voting on Reduction in Midterm Polling Locations*, NBC DFW (Aug. 4, 2026), <https://www.nbcdfw.com/news/politics/lone-star-politics/tarrant-county-commissioners-to-vote-on-reducing-polling-locations-for-november-midterm-election-4058099>.

² Commissioner Matt Krause made the motion to approve the proposal, which was seconded by Commissioner Manny Ramirez. *See* Minutes of the Comm’rs Ct., Regular Term, Tarrant Cnty. Comm’rs. Ct. (Aug. 4, 2026), available at: https://s3.us-west-004.backblazeb2.com/agendalink-pdf/tarrantcountytx/pdfs/agenda/6a4fe7d41de6ee453987c7e6/CommissionersCourt_2026-08-04.pdf.

³ Cecilia Lenzen, *How Many Voting Sites Does Tarrant County Need? Commissioners to Decide in September*, KERA News (Aug. 10, 2026), <https://www.keranews.org/news/2026-08-11/how-many-voting-sites-does-tarrant-county-need-commissioners-to-decide-in-september>.

⁴ *See* Consideration to Approve Election Day Voting Sites for the General Election to be Conducted on November 3, 2026, Tarrant Cnty. Comm’rs. Ct., <https://s3.us-west-004.backblazeb2.com/agendalink->

especially at such a large scale, will harm Tarrant County voters and their right to participate in the democratic process—and cause particular harm to Black, Latino, and AAPI voters who already face significant barriers to exercising that fundamental right. The Commissioners Court must reject this proposal.

When the Commissioners Court first heard public testimony over proposed changes, residents decried the proposal and implored the Commissioners Court to preserve their ability to access the polls. One resident shared that “cutting the budget and reducing polling locations is disenfranchising the people . . . and the invitation to exercise our freedom to vote should be met with more polling locations, not less.”⁵ Another resident called the proposal “shameful.”⁶

In addition to being anti-democratic, the proposal and process are likely illegal. The Texas Election Code does not authorize Tarrant County to combine precincts except to “give effect to a redistricting plan.”⁷ But there is no new redistricting plan in Tarrant County. The last redistricting change occurred in June 2025, and in the seven most recent elections held since that change, the Commissioners Court has not attempted to combine precincts.⁸ There is simply no new plan to which to “give effect.”

Voting is “a fundamental political right” that is “preservative of all rights.”⁹ It is essential to a “free and democratic society.”¹⁰ The Commissioners Court should be preparing for and promoting robust democratic participation by Texans in the midterm elections, not aiming to reduce access to the democratic process in the name of cutting costs. Voters deserve to have a say in how Tarrant County allocates its budget: cutting access to the polls to save money undercuts this very democratic process. Ahead of the September 1 Commissioners Court meeting, we strongly urge you to change course.

I. Black, Latino, and AAPI Voters Bear the Brunt of Poll Site Closures.

The proposed poll site closures sweep across Tarrant County and many of the locations proposed to be cut would be in areas with a high percentage of Black, Latino, and AAPI voters. For example, the proposed reductions encompass south and southeast Fort Worth, which are predominately Black and Latino communities, as well as central and eastern Arlington, which are predominately Black, Latino, and AAPI communities.¹¹ This is particularly worrisome

pdf/tarrantcountytexas/pdfs/topics/6a7f25bb630c7d4b01e0bbb2/Election_Day_Polling_Sites_List.pdf (last accessed Aug. 28, 2026).

⁵ *Tarrant County Commissioners Court: August 4th, 2026*, TarrantCountyTX, YouTube, at 2:24:32-2:25:09 (Aug. 4, 2026), https://www.youtube.com/watch?v=kc7WA_VNrxl

⁶ *Id.*, at 4:03:16-4:04:14.

⁷ Tex. Elec. Code § 42.0051.

⁸ S.E. Jenkins, *Appeals Court Upholds Tarrant County GOP-Drawn Redistricting Map*, CBS News (Oct. 29, 2025), <https://www.cbsnews.com/texas/news/appeals-court-upholds-tarrant-county-gop-drawn-redistricting-map/>.

⁹ *Yick Wo v. Hopkins*, 118 U.S. 356, 370 (1886).

¹⁰ *Reynolds v. Sims*, 377 U.S. 533, 561–62 (1964).

¹¹ Census Tract 1059.02, Tarrant Cnty., Tex., Census Rep., <https://www.censusreporter.org/profiles/14000US48439105902-census-tract-105902-tarrant-tx/> (last visited Aug. 7, 2026); Census Tract 1046.01, Tarrant Cnty., Tex., Census Rep., <https://censusreporter.org/profiles/14000US48439104601-census-tract-104601-tarrant-tx/> (last visited Aug. 7, 2026); Census Tract 1115.69, Tarrant Cnty., Tex., Census Rep.,

because robust data shows that the closure of poll sites do not affect all voters equally. These actions impose unique burdens on voters of color due to enduring racial inequalities and discrimination.

When poll sites disappear, voters must travel farther, wait in longer lines, and spend more time away from work, school, family, and other responsibilities, increasing the likelihood of those voters not voting at all.¹² Data shows that people of color bear this burden disproportionately. For example, voters of color nationally are already three times more likely to wait more than thirty minutes and six times more likely to wait more than an hour to cast their ballots.¹³ Further, restricted access to financial resources creates hurdles to even arriving at a poll site before enduring the long lines.¹⁴ In Texas, one in twenty households does not possess a personal vehicle,¹⁵ and more than 3.5 million Texans lack access to public transportation,¹⁶ meaning *any* reduction in the number of poll sites available to voters in and or near their communities will have a significant disenfranchising effect on a large segment of the population. But the impact undoubtedly falls more heavily on Black communities where more than *one in ten* households do not possess a vehicle¹⁷ and where one in five people lives below the poverty level and will thus struggle to arrange alternative paid transportation.¹⁸ In Texas, poll site consolidation has already increased the distance to vote by an average of 4.3 miles.¹⁹ Tarrant County should not follow or exceed this trend.

Indeed, resource disparities are unmistakable in Tarrant County, where the median income in 2022 for Black families in Fort Worth was \$50,005, and, for Hispanic families,

<https://censusreporter.org/profiles/14000US48439111569-census-tract-111569-tarrant-tx/>; Census Tract 1223, Tarrant Cnty., Tex., Census Rep., <https://censusreporter.org/profiles/14000US48439122300-census-tract-1223-tarrant-tx/> (last visited Aug., 28, 2026).

¹² A Brennan Center report reveals that long waits at polling places, especially after polling location closures, are especially disenfranchising to voters of color. Black and Latino voters waited, on average, approximately 45 percent longer than white voters. See Hannah Klain, et al., *Waiting to Vote: Racial Disparities in Election Day Experiences*, 4-6, Brennan Ctr. for Just. (2020), <https://www.brennancenter.org/our-work/research-reports/waiting-vote>.

¹³ *Id.*

¹⁴ Enrico Cantoni, *A Precinct Too Far: Turnout and Voting Costs*, 12 Am. Econ. J.: Applied Econ. 61, 83 (Jan. 2020).

¹⁵ *Car Access: Everyone Needs Reliable Transportation Access and in Most American Communities That Means a Car*, Nat'l Equity Atlas, <https://www.nationalequityatlas.org/indicators/car-access#/?breakdown=1&geo=02000000000048000> (last accessed Aug. 25, 2026).

¹⁶ Texas A&M Transp. Inst., *Texas Transit Needs Assessment Identifies Underserved Areas of the Lone Star State*, 55 Tex. Trans. Researcher (2019), <https://tti.tamu.edu/researcher/texas-transit-needs-assessment-identifies-underserved-areas-of-the-lone-star-state/>.

¹⁷ *Car Access: Everyone Needs Reliable Transportation Access and in Most American Communities That Means a Car*, Nat'l Equity Atlas, <https://www.nationalequityatlas.org/indicators/car-access#/?breakdown=1&geo=02000000000048000> (last accessed Aug. 25, 2026).

¹⁸ *Id.*

¹⁹ *Polling Place Consolidation: Negative Impacts on Turnout and Equity*, 4-6, Voting Rts. Lab (Dec. 2023) <https://votingrightslab.org/wp-content/uploads/2023/12/Polling-Place-Consolidation-Negative-Impacts-on-Turnout-and-Equity.pdf>.

\$64,517.²⁰ By contrast, for white families, it was \$90,271.²¹ Compounding and disparate barriers to voting access should be of particular concern to County leadership as Tarrant County has become one of the nation’s fastest growing counties²² with growing racial and ethnic diversity.²³

The costs that voters would be forced to bear if these changes are adopted—rearranging childcare, navigating longer commutes, losing wages from deciding between going to work and going to vote—would further disenfranchise already marginalized communities.²⁴ Eliminating 29 percent of Tarrant County’s poll sites would concentrate more voters into fewer sites, increasing the likelihood of overcrowding, longer lines, and delays in ballot processing, and compounding the racial disparities that already make voting difficult for voters of color. These burdens cannot be reasonably justified.

II. The Burdens on Voters Outweigh the Limited and Unpersuasive Rationales for Reducing Poll Sites Ahead of the November 2026 Elections.

Last year, this body noted “low turnout” as its rationale for reducing poll sites, despite the fact that 47 percent of registered voters voted in 2025—a high turnout compared to previous odd-year elections.²⁵ While a county may appropriately seek to save public funds where possible, that cannot come at the cost of democratic participation. Fiscal responsibility should not require eliminating 44 or 29 percent of the places where Tarrant County voters can exercise their fundamental right to vote. Administering elections is not an optional government service in a democracy, and poll sites are not discretionary needs to be sacrificed in the name of cutting costs.

This proposal before the Commissioners Court would unnecessarily exacerbate the long lines Tarrant County voters already face at poll sites. In the March 2026 primary, news reports documented hour-long wait times at poll sites in Tarrant County.²⁶ At the Brookside Center site,

²⁰ Emily Wolf, *Black Families Earn Far Less than White Families in Fort Worth. What is the Solution*, Fort Worth Rep. (Sept. 28, 2023), <https://fortworthreport.org/2023/09/28/black-families-earn-far-less-than-white-families-in-fort-worth-what-is-the-solution/>.

²¹ *Id.*

²² Amber Heckler, *Tarrant County Booms as 10th Fastest-Growing U.S. County in 2024*, Culture Map Fort Worth (Mar. 27, 2025) <https://fortworth.culturemap.com/news/city-life/tarrant-county-population-growth-2024/>

²³ Brooke Colombo, *Tarrant County’s Growing Racial Diversity in Suburbs Outpaces Urban Core*, Fort Worth Rep. (Aug. 30, 2021), <https://fortworthreport.org/2021/08/30/tarrant-countys-growing-racial-diversity-in-suburbs-outpaces-urban-core/>.

²⁴ In the recent February election for Senate Special District 9, Tarrant County voters endured waits of up to 45 minutes—a burden that will likely worsen if polling locations are cut. See Jack Fink, *In Political Upset, Democrat Taylor Rehmet Defeats Republican Leigh Wambsganss in North Texas State Senate Race*, CBS (Feb. 1, 2026) <https://www.cbsnews.com/texas-senate-district-9-early-vote-rehmet-leads-wambsganss-tarrant-county>.

²⁵ *Id.*; Cecillia Lenzen & Drew Shaw, *Tarrant County Sees Higher Than Normal Voter Turnout, Despite Polling Place Restrictions*, Fort Worth Rep. (Nov. 5, 2025) <https://fortworthreport.org/2025/11/05/tarrant-county-sees-higher-than-normal-voter-turnout-despite-polling-place-reductions>.

²⁶ Rachel Royster, *Texas Supreme Court Stays Voting Hour Extension for Democrats in Dallas County*, Star-Telegram (Mar. 3, 2026), <https://www.star-telegram.com/news/politics-government/election/article314899135.html#storylink=cpy>.

nonpartisan volunteer poll monitors spotted a two-hour wait time just 20 minutes before polls closed, forcing voters to dash between sites in search of a shorter line.²⁷ News reports documented voters lining up at the Elzie Odom Athletic Center in Arlington at 6:45 a.m., already forming a 45-minute line before polls even opened.²⁸

These issues are not new to Tarrant County. From early voting to Election Day for the November 2024 election, 160 poll sites in Tarrant County reported wait times that, at some point, were over thirty minutes, according to data produced by the County. Some locations, like the Golden Triangle Branch Library and Ron Wright Lake Arlington Library, each received nearly 300 reports of wait times over thirty minutes from early voting through Election Day. Yet, tellingly, both of these locations were eliminated under the pending proposal.²⁹

The proposal also cuts poll sites that are close to sites that saw high wait times in the November 2024 election, like the City of Arlington South Service Center and the Bedford Public Library, meaning voters likely face even longer lines this fall.³⁰ News helicopters captured images of examples of long lines in Tarrant County during early voting for the 2024 general election (Image 1).³¹



Image 1: News helicopters found long lines at Tarrant County poll sites during early voting for the 2024 general election.

Members of this body explained that, with this proposal, their goal is to eliminate poll locations that fewer than 20 people used.³² But not a single poll site in the November 2024 election saw fewer than 20 people vote there—in fact, only eight sites saw fewer than 100 people vote there on Election Day.³³

The fiscal justifications the Commissioners Court cites to explain the proposed cuts do not outweigh the outsized burdens on the fundamental right to vote and the factual claims the Commissioners Court made are belied by this County’s own data. When a state law burdens a voter’s constitutional rights, the state must assert “precise interests” at stake “as justifications

²⁷ Internal report (on file with LDF).

²⁸ Rachel Royster, *Texas Supreme Court Stays Voting Hour Extension for Democrats in Dallas County*, Star-Telegram (Mar. 3, 2026), <https://www.star-telegram.com/news/politics-government/election/article314899135.html#storylink=cpy>.

²⁹ County data provided to LDF via records request.

³⁰ *Id.* The county received 220 reports of wait times in excess of 30 minutes at City of Arlington South Service Center, and 243 reports of wait times in excess of 30 minutes at the Bedford Public Library, from early voting through Election Day.

³¹ Steven Dial, *Texas Early Voting Kicks Off With Long Lines at Some Polling Locations*, Fox4 KDFW (Oct. 21, 2024), <https://www.fox4news.com/news/texas-early-voting-long-lines>.

³² Rachel Royster, *Tarrant’s Slowest Voting Locations are Being Targeted. Here’s Where They Are*, Star-Telegram (Aug. 19, 2026), <https://www.star-telegram.com/news/politics-government/article316926585.html>.

³³ County data provided to LDF via records request.

for the burden imposed by its rule on the right to vote.”³⁴ That interest must be weighty enough to overcome the “character and magnitude of the asserted injury to the rights protected by the First and Fourteenth Amendments.”³⁵ The Commissioners Court’s asserted interest in saving money by operating fewer poll sites does not meet this burden. While cost savings can qualify as “a legitimate state objective,” here, they do not outweigh the massive burden on voters from closing nearly half of Election Day poll sites.³⁶ And, what’s more: the Commissioners Court has put forth “no evidence” that it would “struggle” to handle costs.³⁷

III. The Proposed Cuts Likely Violate Texas Law.

In a county that uses the countywide polling place program, Texas law permits a Commissioners Court to combine election precincts only when redistricting-related boundary changes leave one or more precincts with fewer than 3,000 registered voters.³⁸ The Commissioners Court cited this provision of Texas law to justify its decision to combine precincts.³⁹ It reads:

If changes in county election precinct boundaries to give effect to a redistricting plan result in county election precincts with fewer than 3,000 registered voters, a commissioners court for a general or special election, or for a primary election the county executive committee of a political party conducting a primary election, may combine county election precincts notwithstanding Section 42.005 to avoid unreasonable expenditures for election equipment, supplies, and personnel.⁴⁰

The most recent redistricting plan was implemented in June 2025 ahead of the November 2025 special election.⁴¹ The Commissioners Court combined precincts in August 2025, pursuant to Section 42.0051.⁴² But more than a year has passed since the last redistricting, and this body has not combined precincts in any other election since then, including the most recent primary election.

Texas law allows counties that use countywide polling, like Tarrant County,⁴³ to offer fewer poll sites—specifically, “at least 50% of the number of precinct polling places that would otherwise be located in the county for a particular election.”⁴⁴ Tarrant County has 707 precincts, so the County must offer 356 poll sites absent a separate legal authority to combine precincts.

³⁴ *Burdick v. Takushi*, 504 U.S. 428, 434 (1992).

³⁵ *La Union del Pueblo Entero v. Abbott*, 167 F.4th 743, 760 (5th Cir. 2026) (quoting *Anderson v. Celebrezze*, 460 U.S. 780, 789 (1983)).

³⁶ *Dudum v. Arntz*, 640 F.3d 1098, 1116 (9th Cir. 2011).

³⁷ *Obama for Am. v. Husted*, 697 F.3d 423, 433-34 (6th Cir. 2012).

³⁸ Tex. Elec. Code § 42.0051.

³⁹ *Tarrant Cnty. Comm’rs., Consideration of Approval to Combine Election Precincts Pursuant to Texas Election Code Section 42.0051* (Aug. 4, 2026), <https://print.agendalink.app/v6/tarrantcountytexas/6a5a6d09610b541dc4889e34>

⁴⁰ Tex. Elec. Code § 42.0051(a).

⁴¹ *Tarrant Cnty. Redistricting*, Tarrant Cnty., Tex., <https://www.tarrantcountytexas.gov/redistricting> (last visited Aug. 7, 2026).

⁴² *Id.*

⁴³ *Id.*

⁴⁴ Tex. Elec. Code § 43.007(f).

Here, Texas law does not authorize the proposed combination—or any combination ahead of the general election—as there has been no “change[] in county election precinct boundaries” or “redistricting plan.”⁴⁵

Guidance from the Texas Secretary of State’s office makes this especially clear: the only combination allowed in a general election is to combine a precinct with under 3,000 voters with “one or more other precincts,” and the combined precinct cannot have more than 5,000 registered voters.⁴⁶ And, to be sure, this action is still only permissible pursuant to Section 42.0051(a), which applies only after a new redistricting plan takes effect.

The Commissioners Court has not pointed to any authority to combine precincts in the manner proposed. The Commissioners Court should reject this proposal because it violates the Texas Election Code, in addition to senselessly burdening voters.

IV. Preserving Existing Polling Locations.

We urge the Commissioners Court to reject the proposed reduction of poll sites, preserve and maintain all existing locations, and consult directly with the County’s voters, especially Black, Latino, and AAPI voters who will bear the greatest barriers, before considering any reductions. Tarrant County voters should not have to travel farther, wait longer, or upend their lives to simply have an equal voice in their government. This proposal is not a minor administrative adjustment; it is a choice about whose participation the County will facilitate and whose participation it is willing to burden. Efforts to suppress the political participation of Black, Latino, and AAPI voters—or any voters—cannot be excused or justified as “fiscal responsibility” or “administrative convenience.”

Voter suppression in any form undermines our democracy and the integrity of our elections. The Tarrant County Commissioners Court must ensure that every community across Tarrant County can have meaningful access to our democratic processes. We therefore strongly urge the Commissioners Court to reject this proposal.

Sincerely,
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⁴⁵ Tex. Elec. Code § 42.0051.

⁴⁶ *Consolidation and Combination of Precincts* 4, Tex. Sec’y of State, Elections Div. (Apr. 7, 2026) <https://www.sos.state.tx.us/elections/forms/combination-consolidation-of-precincts.pdf>

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