SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

ITEM: 2.44
(ID # 28742)
MEETING DATE:
Tuesday, August 26, 2025

FROM : EXECUTIVE OFFICE

SUBJECT: EXECUTIVE OFFICE: Receive and File the Legislative Report for August 2025, [All Districts] [$0]

RECOMMENDED MOTION: That the Board of Supervisors:

1. Receive and File the Legislative Report for August 2025.

ACTION:Policy

Carolina Salazar Herrera, Director of Legislative Advocacy 8/21/2025

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Gutierrez, seconded by Supervisor Medina and duly carried by unanimous vote, IT WAS ORDERED that the above matter is received and filed as recommended.

Ayes:	Medina, Spiegel, Washington, Perez and Gutierrez
Nays:	None
Absent:	None
Date:	August 26, 2025
xc:	EO

Kimberly A. Rector
Clerk of the Board
By: _____
Deputy

BACKGROUND:

Summary

Board Policy A-27 provides, in part, that the County's legislative advocates and/or the Executive Office shall provide monthly reports on the progress of County-sponsored legislation and issues at the forefront of discussion at State/Federal levels that may have a fiscal and/or operational impact on the County. Included in the reports shall be known formal positions of notable associations and/or organizations.

ATTACHMENTS:

Legislative Report (August 2025)
CSAC Letters (August 2025)
UCC Letters (August 2025)

LEGISLATIVE REPORT

Board Policy A-27 provides, in part, that the County's legislative advocates and/or the Executive Office shall provide monthly reports on the progress of County-sponsored legislation and issues at the forefront of discussion at the state/federal levels that may have a fiscal and/or operational impact on the County. Included in the reports shall be known formal positions of notable associations and/or organizations. The Legislative Report is meant to meet that requirement.

This report includes updates on the County's federal and state legislative advocacy efforts, legislation of interest, and copies of advocacy letters sent.

OUTREACH & COMMUNICATIONS

Lobby Days

- County Leaders were in Sacramento and Washington, DC, advocating county priorities with the following associations:
    - Veterans Services attended the Annual Veterans Advocacy Day on June 10-11, 2025, in Sacramento
    - County Leaders attended the Southwest Elected Leaders Collaborative Advocacy Day on June 24-25, 2025, in Sacramento

RivCo Bill List

CALIFORNIA STATE ADVOCACY

2025-26 Legislative Session

- **AB 1 (Connolly-D) Residential property insurance: wildfire risk.** This bill would require the California Department of Insurance to periodically review and update wildfire risk mitigation regulations, incorporating public input and consulting with state agencies, while emphasizing the use of noncombustible materials and maintaining a structured process for regulatory amendments.
  Position: Support
  Impact: This bill is intended to protect homes and bring down insurance rates, in keeping with the Board's previous item on September 10, 2024.
- **AB 53 (Ramos-D) Personal income taxes: exclusion: Military Services Retirement and Surviving Spouse Benefit Payment Act.** Would provide tax exclusions for up to $20,000 of retirement and annuity payments for qualified military personnel and their families, aiming to honor their service and support their financial stability.
  Position: Support [Per Board Agenda Item 3.3 on April 15, 2025.]
- **AB 339 (Ortega-D) Local Public employee organizations: notice requirements.** This bill would require counties to give the recognized employee organization no less than 120 days' written notice (and opportunity to request a meet-and-confer) before issuing a request for proposals, request for quotes, or renewing or extending an existing contract to

perform services that are within the scope of work of the job classifications represented by the recognized employee organization.
Position: Oppose

Impact: AB 339 would significantly impede our county's ability to work with private, non-profit, and community-based organizations, by imposing onerous obligations and costs on local contracts.

- **AB 516 (Kalra-D) Registered veterinary technicians and veterinary assistants: scope of practice.** Would expand the scope of practice for registered veterinary technicians and veterinary assistants, allowing them to perform additional animal health care services under veterinary supervision, including dental procedures and treatments for animals in shelters and humane societies.
  Position: Support
- **AB 538 (Berman-D) Public works: payroll records.** Would require a public agency to obtain Certified Payroll Records from contractors upon request by a member of the public, despite the State Department of Industrial Relations being the enforcing agency with existing authorization to demand those records, without providing state funding.
  Position: Oppose [Per attached]
- **AB 571 (Sharon Quirk-Silva-D) California Environmental Quality Act: exemption: Gypsum Canyon Veterans Cemetery.** Would expedite the approval process for the Gypsum Canyon Veterans Cemetery in Orange County, ensuring the timely creation of this vital resource while balancing community needs and responsible governance.
  Position: Support [Per attached]
- **AB 607 (Rodriguez-D) CalWORKs: Home Visiting Program.** This bill updates the CalWORKs Home Visiting Program to ensure families in voluntary, evidence-based programs can fully participate and receive all intended benefits.
  Position: Support [Per attached]
- **AB 690 (Schultz-D) Criminal procedure: indigent defense compensation.** Would impose new standards and costly mandates on counties for indigent defense services, eliminating flat fee compensation models without providing additional state funding.
  Position: Oppose [Per attached]
- **AB 691 (Wallis-R) Personal Income Tax Law: credits: pet adoption and medical expenses.** Would provide tax credits for pet adoption and medical expenses, allowing taxpayers to claim up to $250 for adoption fees and up to $500 for veterinary care within the first year of adoption.
  Position: Support
- **AB 735 (Carillo-D) Planning and zoning: logistics use: truck routes.** This bill updates zoning and planning regulations for logistics use developments, refining the truck route circulation element requirements.
  Position: Support

  Impact: RivCo was mandated to comply with these regulations by 2026. Recent amendments allow counties to make a good faith effort towards meeting the circulation element requirements.
- **AB 882 (Papan-D) Electronic court reporting.** Would temporarily allow California courts to use electronic recording for civil proceedings when low-income litigants request a verbatim record and court reporters are unavailable.
  Position: Support

- **AB 871 (Stefani-D) Mandated reporters of suspected financial abuse of an elder or dependent adult.** Would require financial institutions to train mandated reporters annually on identifying and reporting elder financial abuse, immediately share reporting mechanisms with clients, and encourage complaint submissions within 24 to 48 hours.
  Position: Support
  Impact: In 2024, RivCo handled 20,784 Adult Protective Services cases, with 29% involving suspected financial abuse. This bill would enhance efforts to stop criminals, streamline reporting for financial institutions, and improve recovery of stolen funds.
- **AB 1016 (Gonzalez-R) Power facility and site certifications: thermal powerplants: geothermal resources.** Would allow certain geothermal powerplants to be exempt from certification requirements until 2030, provided they meet specific criteria, with local agencies overseeing environmental reviews and ensuring skilled workforce compliance.
  Position: Support
- **AB 1031 (Gonzalez-R) Hazardous waste control laws: exemption: geothermal resources.** Would limit the generation and handling fee for geothermal waste that is not exempt from hazardous waste control laws to a maximum of $10 per ton.
  Position: Support
- **AB 1145 (Gonzalez-R) State highways: safety: State Highway Route 74: report.** Would mandate a detailed safety study and recommendations for State Highway Route 74, focusing on accident data, enforcement facility bypassing, and road safety improvements.
  Position: Support
- **AB 1288 (Addis-D) Registered environmental health specialists.** Would amend the Health and Safety Code to revise educational and examination requirements for environmental health specialists, extend trainee supervision, expand practice scope, and enhance public access to specialist registries.
  Position: Support
- **AB 1313 (Papan-D) Water quality: permits.** This bill restricts employer use of workplace surveillance tools in certain areas, grants workers privacy rights, establishes penalties for violations, and provides enforcement and anti-retaliation protections. CSAC and a large coalition of government agencies have asked that public employers with labor agreements be exempted from these rules, but that request has been rejected.
  Position: Oppose
- **AB 1331 (Elhawary-D) Workplace surveillance.** Limits workplace surveillance in specific areas, establishes penalties for violations, and provides enforcement.
  Position: Oppose [Per attached]
- **AB 1337 (Ward-D) Information Practices Act of 1977.** This bill would expand data rules for public agencies, increase county liability and costs, threatens RivCoOne, and denies reimbursement for the new mandate.
  Position: Oppose [Per attached]
- **AB 1358 (Valencia-D) Santa Ana River Conservancy Program: lower Santa Ana River region.** Would mandate that 60% of funds for Santa Ana River Conservancy projects be allocated to urbanized areas in the Lower Santa Ana River Region to aid disadvantaged communities.
  Position: Oppose
  Impact: This bill would restrict Proposition 4 funds that RivCo Parks advocated for.

- **AB 1430 (Bennett-D) County recorders: fees.** Would increase recording fees from $10 to $15 for the first page and $3 to $4 for additional pages, while raising the document system maintenance allocation from $1 to $3 per additional page to support modernization and efficient public service.
  Position: Support
  Impact: According to the Riverside County Assessor-Clerk-Recorder's Office, AB 1430 strengthens the financial sustainability of County Recorders' offices, ensuring that the cost of services is fairly aligned with those who use them rather than being subsidized by the general public.
- **ACR 37 (Wallis-R) The Assistant Chief Josh Bischof, Captain Tim Rodriguez, and Pilot Tony Sousa Memorial Highway.** Assistant Chief Josh Bischof, Captain Tim Rodriguez, and Pilot Tony Sousa tragically passed while they were working tirelessly to keep our communities safe during the Broadway Wildland Fire in 2023. This resolution would rename a portion of I-10 through Cabazon in their memory.
  Position: Support
  Impact: This highway would serve as a reminder of their valor, etched into the roads we travel, so that their memory and sacrifice will never be forgotten.
- **SB 1 (Seyarto-R) Personal income taxes: exclusion: Military Services Retirement and Surviving Spouse Benefit Payment Act.** SB 1 would exclude two forms of military retirement income from state income tax.
  Position: Support
  Impact: SB 1 is a commonsense measure that aligns California with the majority of states that have already recognized the importance of this exemption for Veterans and surviving spouses.
- **SB 7 (McNerney-D) Employment: automated decision systems**. Would establish new requirements for transparency, with overly broad definitions for automated decision systems in employment.
  Position: Oppose [Per attached]
- **SB 72 (Cabellero-D) The California Water Plan: long-term supply targets.** This bill would complement and amplify Governor Newsom's Water Supply Strategy, ensuring there are reasonable water supply targets.
  Position: Support [Per Board Agenda Item 3.4 on November 1, 2022.]
  Impact: This bill is being proposed by the Solve the Water Crisis Coalition as a solution to creating more reasonable water targets.
- **SB 239 (Arreguin-D) Open meetings: teleconferencing: subsidiary body.** Would authorize members of local non-decision-making legislative bodies to participate in public meetings via two-way virtual teleconferencing without posting their location.
  Position: Support
  Impact: Would allow virtual participation on County appointed advisory boards and commissions, removing barriers for participation.
- **SB 346 (Durazo-D) Local agencies: transient occupancy taxes: short-term rental facilitator.** This bill would authorize a county to require a short-term rental facilitator to report the physical address, including a 9-digit ZIP Code of each short-term rental within its jurisdiction.
  Position: Support
  Impact: The bill would assist the county's ability to collect transient occupancy taxes from short-term rentals.

- **SB 369 (Padilla-D) Salton Sea: restoration projects: skilled and trained workforce.** Would mandate the use of a skilled and trained workforce for Salton Sea restoration projects starting January 1, 2026, to improve local economic conditions and project quality, with exceptions for projects under specific labor agreements.
  Position: Support
- **SB 413 (Allen-D) Juveniles: case file inspection.** This bill would expedite access to relevant juvenile case records for both local agencies and plaintiffs with claims against local agencies. While still maintaining confidentiality protections.
  Position: Support
  Impact: SB 413 would improve existing procedures for resolving claims against local agencies for both plaintiffs and defendants by saving both counties and child litigants suing counties time and money.
- **SB 485 (Reyes-D) County public defender: appointment.** Limits removal of Public Defenders to a 3/5 Board vote for cause, reducing accountability compared to other department heads; Riverside County and CSAC propose aligning terms with County Counsel.
  Position: Oppose unless amended [Per attached]
- **SB 496 (Hurtado-D) Advanced Clean Fleets Regulation: appeals advisory committee: exemptions.** Would establish the Advanced Clean Fleets Regulation Appeals Advisory Committee, ensuring transparent review of exemption requests for transitioning government and high-priority truck fleets to zero-emission vehicles while expanding emergency vehicle exemptions.
  Position: Support
- **SB 534 (Padilla-D) Green Empowerment Zone for the Salton Sea and Southeastern Desert Valleys.** Would establish a Green Empowerment Zone for the Salton Sea and Southeastern Desert Valleys to promote economic development and clean energy transition in historically underserved areas, with governance by a diverse board and annual reporting requirements.
  Position: Support
- **SB 577 (Laird-D) Government.** Would revise procedures and standards for civil actions against public entities, particularly in childhood sexual assault cases, tightens filing requirements and timelines, and modifies rules for public agency liability and debt repayment.
  Position: Support
- **SB 601 (Allen-D) Water: waste discharge.** Expands California water rules to cover unprotected 'nexus waters,' strengthen standards, boost enforcement, and ensure ongoing oversight.
  Position: Oppose
- **SB 694 (Archulets-D) Deceptive practices: service members and veterans.** Would strengthen veteran protections by banning unaccredited VA claims fees, enhancing consumer safeguards, and securing logins.
  Position: Support

FEDERAL ADVOCACY

- **HR 471 Westerman (R-AR-4) Fix Our Forests Act.** Would enhance forest management and reduce wildfire risks through interagency coordination, expedited processes, and innovative strategies, while also addressing vegetation management, reforestation, and technology deployment, with a focus on collaboration across federal, state, and tribal entities.
  Position: Support [Per Board Agenda Item 3.27 on May 8, 2025]
  Impact: Reducing the National Environmental Policy Act barriers could add value to forest fuel management and abatement in areas that back up to private homes and property. This legislation would also assist in issues like the checkerboard pattern of public/private land ownership currently impeding the construction of a uniform fire break along the western edge of the Cleveland National Forest.
- **HR 1225 Calvert (R-CA-41) To direct the United States Postal Service to designate a single, unique ZIP Code for Eastvale, California.** Would direct the U.S. Postal Service to designate a single, unique ZIP Code for Eastvale, California.
  Position: Support [Per Board Agenda Item 3.1 on February 7, 2023]
- **HR 4038 Kim (R-CA-40) Wildfire Response and Preparedness Act of 2025.** Would require federal agencies to set and report on standardized, expedited wildfire response times and resource needs, aiming to improve coordination and effectiveness in federal wildfire management.
  Position: Support

COUNTY OF RIVERSIDE

Board of Supervisors

District 1	**Jose Medina** 951-955-1010
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District 4	**V. Manuel Perez** 951-955-1040
District 5	**Yxstian Gutierrez** 951-955-1050

July 31, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
1020 N Street, Room 545
Sacramento, CA 95814

Re: Assembly Bill 538 (AB 538) – Berman
Public works: payroll records
As amended 5/23/2025 – OPPOSE

Dear Senator Caballero:

On behalf of the County of Riverside Board of Supervisors, I write to express our opposition to AB 538, as this measure would impose unnecessary burdens on local agencies like ours, serving 2.5 million people spread across 7,300 square miles.

Under current law, contractors and subcontractors working on public works projects are already required to maintain payroll records for all workers involved in such projects. Current law further requires that certified copies of these records be made available upon request to either the awarding body (such as a county) or the Division of Labor Standards Enforcement (DLSE). Importantly, enforcement authority currently rests solely with the DLSE, not local awarding bodies. Despite this existing framework, AB 538 requires local agencies to seek out records that may not be in their possession without providing any new enforcement mechanisms for the DLSE, which is the appropriate body to compel compliance.

Additionally, the bill asserts that it does not create a reimbursable state mandate because the only costs would result from changes to a crime or infraction. This assertion is inaccurate; AB 538 clearly creates a new mandate by requiring local agencies to engage in additional activities—namely, proactively seeking payroll records from contractors or subcontractors even when the agency does not possess such records. This is a new burden that should be recognized as a reimbursable state mandate under existing law.

The County of Riverside is already facing increasing administrative challenges from expanding state mandates, emergency response obligations, and federal funding uncertainties. Imposing additional, unnecessary requirements without corresponding resources only exacerbates these challenges.

For these reasons, the County of Riverside opposes this measure. Thank you for your consideration. Should you have any questions regarding this letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the Riverside County Executive Office (951) 955-1180 or csherrera@rivco.org.

Sincerely,

Supervisor V. Manuel Perez
Chair, County of Riverside Board of Supervisors

cc: Members of the Senate Appropriations Committee
Honorable Members, County of Riverside Legislative Delegation

COUNTY OF RIVERSIDE

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July 31, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
California State Senate
State Capitol, Room 412
Sacramento, CA 95814

Re: Assembly Bill 571 (AB 571)– QUIRK-SILVA
California Environmental Quality Act: exemption: Gypsum Canyon Veterans Cemetery
As amended June 19, 2025 – SUPPORT

Dear Senator Caballero:

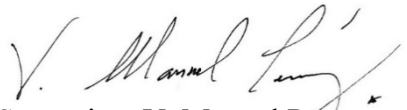
On behalf of the County of Riverside Board of Supervisors, I write to express our support for AB 571, which provides a limited and temporary exemption from the California Environmental Quality Act (CEQA) for the development of the Gypsum Canyon Veterans Cemetery in Orange County.

AB 571 strikes a thoughtful balance between the urgent needs of the community and responsible governance. By expediting the approval process for this long-awaited cemetery, the bill affirms California's commitment to honoring its veterans with dignity and efficiency — a priority shared by Riverside County and clearly articulated in our 2025–26 Legislative Platform.

The bill's sunset date of January 1, 2030, ensures that this exemption is both targeted and temporary. At its core, AB 571 enables the state to remove procedural barriers that would otherwise delay the creation of a vital resource for veterans and their families. This project will not only provide critical burial space for those who have served but also support local economic development through construction-related employment and community investment.

Riverside County, home to over 130,000 veterans, recognizes that honoring service must be reflected in timely, tangible action. AB 571 delivers on that principle. For these reasons, the County of Riverside supports this measure. Thank you for your consideration. Should you have any questions regarding this letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the Riverside County Executive Office (951) 955-1180 or csherrera@rivco.org.

Sincerely,



Supervisor V. Manuel Perez
Chair, County of Riverside Board of Supervisors

cc: Assembly Member Sharon Quirk-Silva
Members of the Senate Appropriations Committee
Honorable Members, County of Riverside Legislative Delegation

COUNTY OF RIVERSIDE

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July 31, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

Re: Assembly Bill 607 (AB 607) – Rodriguez
CalWORKs: Home Visiting Program
As introduced February 13, 2025 – SUPPORT

Dear Senator Caballero:

On behalf of the County of Riverside Board of Supervisors, I write to express our support of AB 607, which makes necessary statutory changes to the California Department of Social Services' (CDSS) CalWORKs Home Visiting Program (HVP) to ensure that families enrolled in voluntary, evidence-based home visiting programs can participate for the full duration intended by the program models and receive the full range of benefits those programs are designed to provide.

Voluntary evidence-based home visiting programs (HVPs) connect expecting and new parents with trained professionals who offer resources, mentoring, and support focused on child development, family well-being, and community connection. These programs are rooted in rigorous research, meeting federal standards for effectiveness, quality, and replicability. Participation in such programs has been shown to yield substantial benefits, including improved maternal and infant health, reduced emergency room visits, enhanced child safety, and stronger long-term educational outcomes such as improved language development, cognitive skills, and reduced absenteeism and suspensions.

AB 607 addresses current barriers to service by extending eligibility for CalWORKs HVP enrollment to include families with children under 36 months of age and permitting counties to extend family participation in the program by at least 24 months or for the full duration recommended by the applicable HVP model. Our Department of Public Social Services, Department of Public Health, and Riverside County Children & Families Commission are enthusiastic supporters of this expansion, as it is an integral part of "RivCoOne," our integrated services delivery initiative. These changes will ensure that families in Riverside County — and

throughout California — can fully benefit from these vital programs, improving health, educational, and economic outcomes for some of our most vulnerable residents.

For these reasons, the County of Riverside supports this measure. Thank you for your consideration. Should you have any questions regarding this letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the Riverside County Executive Office (951) 955-1180 or csherrera@rivco.org.

Sincerely,

Supervisor V. Manuel Perez
Chair, County of Riverside Board of Supervisors

cc: Honorable Assembly Member Celest Rodriguez
Members and Consultants, Senate Local Government Committee
Honorable Members, County of Riverside Legislative Delegation

COUNTY OF RIVERSIDE

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July 31, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, 412
Sacramento, CA 95814

Re: Assembly Bill 690 (AB 690) – Schultz
Criminal procedure: indigent defense compensation
As Amended May 23, 2025 – OPPOSE

Dear Senator Caballero:

On behalf of the County of Riverside Board of Supervisors, I write to express our opposition to AB 690. While the County shares the author's concerns with providing quality legal services for indigent defendants, AB 690 would impose additional mandates and potentially massive new costs on counties for the provision of those services, resulting in significant challenges to ensuring high-quality legal representation for this vulnerable population. We estimate that the cost to comply with these new mandates could increase costs to our county anywhere from 200-685%.

Both the California and U.S. Constitutions guarantee the right to effective legal counsel for all criminal defendants. In California, the state has delegated the funding and administration of indigent defense services to the 58 individual counties, allowing them the necessary authority and flexibility to structure their defense systems to best meet local needs. AB 690 runs counter to this local authority and flexibility by requiring counties to adhere to new standards from the Office of the State Public Defender (OSPD), imposing sweeping changes on leadership, organizational structure, attorney classification, defense panel procedures, oversight, training, data collection, resources, attorney compensation, and attorney-client communication.

The bill also establishes numerous costly new requirements for county contracts with private firms and non-county attorneys, such as funding for ancillary services beyond attorney compensation, including investigators, social workers, immigration counsel, paralegals, case support, and mitigation specialists. Given shrinking local and state general funds, federal uncertainties, and increased demands on counties, these unfunded mandates would be extremely difficult to achieve without additional financial support from the state.

AB 690 prohibits the use of flat fee or per-case compensation models for indigent defense services, which will have immediate adverse impacts, especially in rural and underserved areas. While Riverside County supports the goal of ensuring manageable caseloads and high-quality legal representation for indigent clients, AB 690 imposes costly and burdensome mandates that are neither practical nor feasible for counties grappling with diverse populations, geography, workforce shortages, and budgetary constraints.

For these reasons, the County of Riverside opposes this measure. Thank you for your consideration. Should you have any questions regarding this letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the Riverside County Executive Office (951) 955-1180 or csherrera@rivco.org.

Sincerely,

Supervisor V. Manuel Perez
Chair, County of Riverside Board of Supervisors

cc: Members of the Senate Appropriations Committee
Honorable Members, County of Riverside Legislative Delegation

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July 31, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

Re: Senate Bill 7(SB 7) – McNerney
Automated Decision Systems
As amended July 9, 2025 – OPPOSE

Dear Assembly Member Wicks:

On behalf of the County of Riverside Board of Supervisors, I write to express our opposition to SB 7, which would establish comprehensive regulations for the use of automated decision systems (ADS) in employment settings in California.

The County of Riverside employs over 36,000 people in more than 40 departments across 7,300 square miles, and managing this diverse workforce increasingly requires modern technology. Our county serves 2.5 million residents, many of whom require a variety of health and human services. Our county is committed to providing financially stable and results-oriented service delivery, and has invested resources in developing an integrated services model, "RivCoOne," which heavily relies on utilizing databases and staff more effectively. SB 7 would impose unnecessary complications and additional costs on our county's routine operations, hindering our efforts to provide efficient services to constituents without a clear or demonstrated need for such measures.

SB 7's Overbroad Scope Would Create Operational Challenges for Local Agencies: While we appreciate the growing concerns around the use of technology, including artificial intelligence and automated tools, the scope of SB 7 is excessively broad. The bill's expansive definition of ADS could encompass a wide array of basic tools used daily by public employers, subjecting these ordinary technologies to extensive new compliance burdens. The notification and appeal requirements alone would impose significant administrative costs and divert limited resources from the delivery of essential services to our communities.

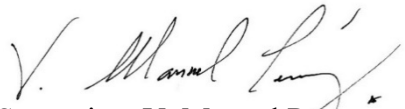
SB 7 Imposes Unfunded Mandates on Local Governments: The bill's reporting, review, and appeals requirements will impose substantial ongoing burdens on county human resources and information technology departments, increasing operational costs and diverting staff from their core responsibilities. Smaller agencies may find compliance particularly challenging, while the bill's enforcement provisions increase the risk of costly litigation. These impacts represent a clear unfunded mandate on local agencies, at a time when counties are already grappling with increasing fiscal constraints.

Potential Operational Impacts and Unintended Consequences: SB 7's broad definitions risk complicating routine technology uses in healthcare and public safety, leading to compliance confusion and increased costs, especially in areas like discipline or termination. Additionally, the bill's rigid mandates could necessitate costly system modifications, strain budgets, and reduce service efficiency during the transition.

Existing Labor Protections Make SB 7 Redundant and Potentially Conflicting: Public employers already operate under significant statutory protections related to employee rights and workplace technologies. Government Code § 3550 and § 3551.5 explicitly prohibit public employers from using any technology to discourage union membership and establish substantial penalties for violations. The requirements in SB 7 risk overlapping and conflicting with these existing laws, creating legal uncertainty and additional liability exposure for counties.

For these reasons, the County of Riverside opposes this measure. Thank you for your consideration. Should you have any questions regarding this letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the Riverside County Executive Office (951) 955-1180 or csherrera@rivco.org.

Sincerely,



Supervisor V. Manuel Perez
Chair, County of Riverside Board of Supervisors

cc: Members of the Assembly Appropriations Committee
Honorable Members, County of Riverside Legislative Delegation

COUNTY OF RIVERSIDE

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July 31, 2025

Assemblymember Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

Re: Senate Bill 485 (SB 485) – Reyes
Appointment of County Public Defender
As amended April 7, 2025 – OPPOSE UNLESS AMENDED
Set for hearing July 15, 2025 – Assembly Public Safety Committee

Dear Assembly Member Wicks:

On behalf of the County of Riverside Board of Supervisors, I write to express our opposition to SB 485 unless the bill is amended to include essential checks and balances regarding the appointment and removal of Board of Supervisors-appointed Public Defenders.

As currently written, SB 485 would convert the employment status of the Public Defender from at-will to one in which removal may only occur by a majority vote of the Board of Supervisors and only for neglect of duty, malfeasance, misconduct in office, or other good cause. While we understand the intention to support the independence of this critical role, we believe the current language would cause damage to accountability and consistency in county governance.

Our requested amendments are those requested by the California State Association of Counties and the Urban Counties of California, and are consistent with sound public administration and good governance. Specifically, we recommend the following:

- **Establishing a defined term of office**, such as the four-year term outlined in Government Code Section 27640 for County Counsel; and
- **Providing a clear process for judicial review** should a Public Defender contest their removal from office.

Without such amendments, the bill would create an indefinite appointment without performance oversight or a clear review mechanism—an anomaly within the broader framework of county department leadership. Department heads should be subject to the same governance expectations, performance standards, and administrative processes to ensure consistent and effective service delivery across all county functions.

We also want to emphasize that these proposed changes would not impair the Public Defender's ethical and constitutional obligations to provide competent legal representation. Rather, they aim to ensure balance between professional independence and responsible oversight—standards we apply to all other senior county executives. The ironic result of this bill, as written, would be to make this critically important job one of the least accountable for doing their job well.
For these reasons, the County of Riverside opposes this measure. Thank you for your consideration. Should you have any questions regarding this letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the Riverside County Executive Office (951) 955-1180 or csherrera@rivco.org.

Sincerely,

Supervisor V. Manuel Perez
Chair, County of Riverside Board of Supervisors

cc: Members, Assembly Appropriations Committee
Honorable Members, County of Riverside Legislative Delegation

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 13, 2025

The Honorable Catherine Blakespear
Chair, Senate Environmental Quality Committee
1021 O Street, Room 3230
Sacramento, CA 95814

RE: AB 28 (Schiavo) Solid waste landfills: subsurface temperatures
As amended on May 9, 2025 – Notice of CONCERNS
To be heard in the Senate Environmental Quality Committee

Dear Chair Blakespear,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write with concerns regarding AB 28 (Schiavo), which would require municipal solid waste (MSW) landfill operators to take corrective measures if gas temperatures exceed specified levels for certain periods of time, and impose significant penalties and potential suspension of the landfill operator's permits.

CSAC shares your concerns regarding the potential impacts that can result from subsurface elevated temperature (SET) events and commitment to protecting California communities. However, the monitoring of temperature alone may not detect every SET event, and not all SET events present a threat to the environment or nearby communities. Further, the gas temperature at the enclosed flare is not representative of a subsurface fire or reaction within the landfill, and the gas temperature in the wells are a more appropriate measure of the landfill's subsurface temperature. Therefore, the definition of "temperature sensor" should be modified or removed. Additionally, a definition for "temperature monitors" should be included as referenced in Section 43031 (c)(3). This section states that reporting data for "each" temperature monitor must be reported publicly every 30 days. At one site, there can be more than 70 temperature monitors. This should be clarified to apply only to the monitor which exceeded the threshold.

According to the U.S. EPA, there are 51 county-owned open landfills in California located in 26 counties and direct enforcement authority for solid waste facilities resides with Local Enforcement Agencies (LEAs). The Department of Resources and Recycling (CalRecycle) certifies LEAs to ensure that the facilities/operations within their jurisdiction operate according to state minimum standards and permit conditions. There are existing regulations addressing landfill gas temperatures including the New Source Performance

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Standards and the National Emission Standards for Hazardous Air Pollutants that have comprehensive protocols for monitoring, correction action plans, and reporting related to elevated landfill gas temperatures. AB 28 would overlap with these existing federal regulations and the bill could introduce discrepancies with current federal standards, potentially leading to confusion and inefficiency in compliance efforts.

While AB 28 requires the California Air Resources Board (CARB) to establish mandatory requirements for the monitoring of landfill gas temperature as part of its landfill methane regulation, it does not specify the date by which that activity must be completed by. The bill also requires the LEA or CalRecycle to impose administrative penalties to be deposited into the Landfill Subsurface Fire Mitigation Account which AB 28 creates. These funds would be available for expenditure by CalRecycle to mitigate SET-related harm. However, we have concerns related to the equitable distribution of funds from the Landfill Subsurface Fire Mitigation Account.

Notwithstanding the merits of this measure, as currently drafted, it creates new, unfunded requirements for county governments. Just like the state, every program and service that a county provides has a cost. Over the past two decades, the state has enacted new, unfunded requirements that are complex and costly, leaving counties with a significant administrative burden and fewer resources to deliver essential services to California residents. Few newly enacted laws that impose new requirements on counties qualify for reimbursement from the state through the Commission on State Mandates. Those few programs that do qualify for state reimbursement must first survive a review process that can last for more than five years before counties receive any funding; all while counties are diligently carrying out the state's priorities with no additional resources.

For these reasons, CSAC has concerns regarding AB 28 as currently written. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

CC : The Honorable Pilar Schiavo, Member of the California State Assembly
Members and Staff, Senate Environmental Quality Committee

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June 13, 2025

The Honorable Susan Rubio
Chair, Senate Insurance Committee
1021 O Street, Suite 2100
Sacramento, CA 95814

RE: AB 226 (Calderon) California Fair Plan Association.
As Amended on May 29, 2025 – Notice of SUPPORT
To be heard in Senate Insurance Committee on June 25, 2025

Dear Chair Rubio,

On behalf of the California State Association of Counties (CSAC) representing all 58 California Counties, I write to support AB 226 (Calderon) which would allow the California Fair Access to Insurance Requirements Plan (FAIR Plan) to access bond funding from the California Infrastructure and Economic Development Bank (IBank).

California is in the midst of a home insurance crisis, with major insurers leaving the state citing regulatory pressure and outsized liability. It is intended to be a temporary safety net, however, as fire risk has increased in California more and more homeowners are finding themselves unable to get any other insurance. As a result, many homeowners have turned to the FAIR Plan for basic property coverage with policies increasing the most in counties with higher concentrations of homes at high wildfire risk.

The FAIR plan is not a state agency nor is it funded by public dollars. Allowing the FAIR Plan access to additional funding through the IBank alleviates some of the financial burden the catastrophic effects wildfires are having on the state.

In recent years, California has experienced an increasing frequency and intensity of disasters, including wildfires. As evidenced by the Los Angeles County Wildfires, communities across all geographical landscapes are under pressure to protect their homes. Policies must be flexible and adaptable to meet the distinct needs, risks, and capacities of each county. For these reasons, CSAC supports AB 226, which affords a level of financial security while the state adapts to a changing environment and the insurance market is restructured.

Sincerely,

Catherine Freeman
Senior Legislative Advocate, CSAC

CSAC Officers

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2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

CC : The Honorable Lisa Calderon, California State Assembly, District 56

June 11, 2025

The Honorable Caroline Menjivar
Chair, Senate Health Committee
1021 O Street, Suite 3310
Sacramento, California 95814

RE: AB 416 (Krell): Involuntary Commitment
As Amended May 7, 2025 – OPPOSE

Dear Chair Menjivar:

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Publica Administrators, Public Guardians, and Public Conservators (CAPAPGPC) we write in respectful opposition of Assembly Bill 416 by Assembly Member Krell, which would require counties to include emergency physicians among professionals who may be designated by the county to cause a person to be taken into custody for assessment, evaluation, and treatment for 72 hours if the person is a danger to themselves or others, or is gravely disabled, provided the emergency physician completes the county's training, application, and approval process.

In 1967, the Lanterman-Petris-Short (LPS) Act was enacted to create a legal framework for due process when an individual is involuntarily detained due to the determination that they are a danger to themselves, others, or gravely disabled. As a part of this due process, individuals have a right to prompt psychiatric evaluation and treatment at a designated facility authorized by the county to provide behavioral health services under LPS. Section 5150(a) of the LPS Act allows certain individuals to detain a person against their will if they believe a person presents harms to themselves, others or is gravely disabled.

Counties already have the authority to designate emergency physicians to place individuals on holds – in fact – multiple counties already designate emergency physicians. As a result, it is unclear why this bill is necessary. When an individual presents at a general acute care hospital and requests voluntary services, there is no need to place that individual on a hold in order to fulfill the hospital emergency department's responsibilities

to stabilize, treat, and transfer the individual to the appropriate level of care. In instances where an individual's condition changes during their voluntary admission and requires placement of an involuntary hold, emergency physicians have their own right to involuntarily detain an individual under Health and Safety Code Section 1799.111. In addition, although they frequently encounter behavioral health crises, emergency physicians do not specialize in the evaluation and treatment of behavioral health conditions, and unfortunately hospitals rarely have on-call specialists available to assist them.

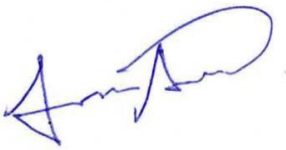
For these reasons, CSAC, UCC, RCRC, and CAPAPGPC must respectfully oppose AB 416. Please do not hesitate to reach out with any questions.

Sincerely,

Jolie Onodera
Senior Legislative Advocate
California State Association of Counties
jonodera@counties.org
916-591-5308

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org
916-447-4806

Kelly Brooks-Lindsey
Legislative Representative
UCC
kbl@hbeadvocacy.com
916-753-0844



Tom Scott
Executive Director
CAPAPGPC
tscott@capapgpc.org
916-382-4703

cc: The Honorable Maggie Krell, Member, California State Assembly
Members and Consultants, Senate Health Committee

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1100 K Street, Suite 101 | Sacramento, CA 95814

June 13, 2025

The Honorable Monique Limón
Chair, Senate Natural Resources and Water
1021 O Street, Room 3220
Sacramento, CA 95814

RE: AB 706 (Aguiar-Curry): Forest Organic Residue, Energy, and Safety Transformation and Wildfire Prevention Fund Act
As Amended on May 23, 2025 – Notice of SUPPORT
To be heard in Senate Natural Resources and Water Committee on June 25, 2025

Dear Chair Limón,

On behalf of the California State Association of Counties, representing all of California's 58 counties, I write in support of AB 706 (Aguiar-Curry) which would help address California's wildfire crisis by establishing the Forest Organic Residue Energy and Safety Transformation and Wildfire Prevention Fund (FOREST) Act which will be used to fund the beneficial use of wood waste that is generated through critical fuel reduction, forest health, and post-fire recovery projects.

In recent years, California has experienced an increasing frequency and intensity of disasters, including wildfires, droughts, floods, and public health emergencies. Each disaster disrupts entire communities, often exceeding the response capacity of local jurisdictions. California's counties have learned difficult lessons from the crises, including the devasting 2025 Los Angeles County Wildfires, which further underscores the need for larger forest management.

Over the past several years the State has invested billions in wildfire prevention and forest resiliency programs, much of which has been distributed through grants to local governments; tribes; Resource Conservation Districts; NGO's; and private landowners for forest health and fuel reduction projects across the state. While these projects have helped the state make progress toward its goal of treating 1 million acres of federal and non-federal land annually, the state has yet to fund a comprehensive strategy to address the byproduct of these essential projects – the accumulation of low-value wood waste in our forests and other wild lands.

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The "California Forest Biomass Pile Data Collection Report," adopted by the Board of Forestry and Fire Protection on December 6, 2023, notes that forest thinning in California alone will generate 10 to 15 million tons of forest biomass waste annually. This figure does not consider the millions of tons of woody materials that must be removed to support the post-fire recovery of the millions of acres of forests that have burned in recent years.

It should also be noted that California has set goals to increase the use of beneficial fire as a vegetation management tool in forested areas. In many instances, pretreatment of these landscapes – including the removal of significant amounts of woody biomass – is essential to reduce the risk and emissions related to beneficial fire.

The lack of a coordinated and sustained strategy to address the accumulation of low-value material generated through prevention and recovery projects is the missing piece in the State's wildfire prevention and forest resiliency efforts and limits the number of acres that can be treated annually. Without sufficient outlets, this material accumulates in the State's forests and other wildland areas, where it is chipped or left in piles to decompose – emitting harmful methane emissions and serving as fuel for future wildfires – or pile burned which results in the unmitigated release of black carbon into the atmosphere.

By establishing a funding mechanism to support bioenergy procurement, AB 706 will address this gap in the state's wildfire prevention and forest resiliency efforts. The legislation recognizes that, like fuel reduction programs, the utilization of low-value wood waste through bioenergy production has statewide benefits that should be addressed through a state-funded program. These benefits include improving air quality and reducing wildfire-related carbon emissions; protecting critical habitat conservation and biodiversity; ensuring the quality of the state's water supply; and reducing the cost of insurance that has increased significantly due to costs associated with wildfires.

For these reasons, CSAC is pleased to offer our strong support for Assembly Bill 706. Should you have any questions regarding our position, please do not hesitate to contact me at 916-662-6400 or at cfreeman@counties.org.

Sincerely,

Catherine Freeman
Senior Legislative Advocate, CSAC

cc: The Honorable Aguiar-Curry, California State Assembly, District 4

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 3, 2025

The Honorable Jesse Arreguín, Chair
Senate Human Services Committee
1020 N Street, Room 521
Sacramento, CA 95814

RE: AB 896 (Elhawary) Foster care: placement transition planning.
As Amended March 17, 2025 – SUPPORT
Set for Hearing in Senate Human Services Committee on June 16, 2025

Dear Senator Arreguín,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of Assembly Bill 896 by Assembly Member Sade Elhawary. This measure would require the California Department of Social Services (CDSS) to issue guidance on best practices and strategies for supporting foster children who are transitioning between placement settings, as well as require each county child welfare agency to adopt placement transition policies.

Over the last decade, California has made significant progress in reducing the number of children and youth in foster care. While counties make every effort to minimize disruptive or traumatic care placement changes, transitions are sometimes necessary to ensure the health and safety of the child or to support permanency outcomes such as reunification or adoption. Despite the thousands of placement changes that occur each year, California lacks statewide guidance on the best practices and policies for managing these transitions.

AB 896 requires CDSS, in consultation with counties and stakeholders, to issue guidance to county child welfare agencies on best practices and strategies for successful placement transition planning. Additionally, this measure equips counties with the necessary resources and tools to develop comprehensive transition planning policies. By recognizing the importance of planning and managing placement transitions in a way that is trauma-informed, youth-centered, and tailored to each child's individual needs, AB 896 will promote greater placement stability and support the long-term well-being of children and families in the foster care system.

CSAC Officers

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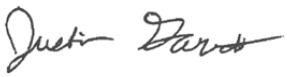
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

For these reasons, CSAC is pleased to support AB 896. Should you have any questions about our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Sade Elhawary, California State Senate
Honorable Members and Consultants, Senate Human Services Committee
Amanda Kirchner, Director of Legislative Advocacy, CWDA

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 9, 2025

The Honorable Jesse Arreguín, Chair
Senate Human Services Committee
1020 N Street, Room 521
Sacramento, CA 95814

RE: AB 898 (Bryan) The Family Urgent Response System.
As Introduced February 19, 2025 – SUPPORT
Set for Hearing in Senate Human Services Committee on June 16, 2025

Dear Senator Arreguín,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of Assembly Bill 898 by Assembly Member Isaac Bryan. This measure would introduce improvements to the Family Urgent Response System (FURS) to ensure FURS teams can be responsive and proactive to the needs of vulnerable families and youth.

FURS is a coordinated statewide, regional, and county-level 24/7 response system designed to provide collaborative and timely state-level phone-based response and county-level in-home, in-person mobile response during situations of instability, to preserve the relationship of the caregiver and the child or youth. Established in 2019 and implemented beginning in 2021, FURS has been a valuable tool for supporting current and former foster youth, caregivers, and families, as well as stabilizing foster care placements. FURS currently receives approximately 5,000 calls annually from foster youth and their caregivers.

To access FURS, a caregiver or foster youth must first contact the state-level hotline, which is staffed with operators trained in conflict resolution and de-escalation techniques who provide immediate assistance over the phone to help defuse conflict and to provide focused engagement and assessment to make a referral to the county mobile response system for further support as appropriate. If dispatched by the state hotline, the county mobile response team provides face-to-face, in-home response, supportive services to address situations of instability, preserve the relationship of the caregiver and the child or youth, develop health conflict resolution and relationship skills, promote healing as a family, and stabilize the situation.

CSAC Officers

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Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

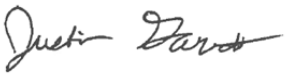
Statute requires the state hotline to dispatch county mobile response teams, which occurs for only 30 percent of calls to the hotline. County mobile response teams are not being fully utilized to support caregivers, children and youth. This results in missed opportunities to prevent a crisis that can lead to placement disruption. Additionally, eligibility for FURS is limited to current and former foster youth, which misses an important opportunity for the program to strengthen at-risk families and prevent entries into foster care.

AB 898 clarifies that counties have the flexibility to dispatch FURS teams, when not otherwise responding to calls placed through the statewide hotline, to respond to local needs without a statewide hotline call. This change would allow county mobile response teams to perform valuable outreach and education to families about FURS, provide support to foster youth with acute needs, and provide transition support during placement changes, among other important services. AB 898 still preserves prioritization for calls made through the statewide hotline and requires that FURS retain the capacity to serve that population.

AB 898 also permits counties to utilize their FURS teams to support families who are receiving family preservation and voluntary or court-ordered family maintenance services, thereby reducing entries into foster care. Finally, the bill requires the county child welfare, probation and behavioral health agencies to revisit their local implementation plan every other year to support cross-system collaboration and enhance overall program efficacy.

This measure will improve lifelong outcomes of those currently served by FURS and expand the benefits of FURS to at-risk families and youth who are currently excluded from these vital supports. For these reasons, CSAC is pleased to support AB 898. Should you have any questions about our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Isaac Bryan, California State Assembly
Honorable Members and Consultants, Senate Human Services Committee
Amanda Kirchner, Director of Legislative Advocacy, CWDA

June 10, 2025

The Honorable Catherine Blakespear
Chair, Senate Environmental Quality Committee
1021 N Street, Room 1200
Sacramento, CA 95814

RE: Assembly Bill 998 (Hadwick) – SUPPORT
As Amended May 23, 2025

Dear Chair Blakespear,

On behalf of the Rural County Representatives of California (RCRC), California Product Stewardship Council (CPSC), National Stewardship Action Council (NSAC), Association of California School Administrators (ACSA), California State Association of Counties (CSAC), Los Angeles Unified School District (LAUSD), RethinkWaste, Tehama County Solid Waste Management Agency (Tehama County SWMA), Del Norte Solid Waste Management Authority (Del Norte SWMA), Solid Waste Association of North America (SWANA) California Chapters Legislative Task Force (LTF), Resource Recovery Coalition of California (RRCC), StopWaste (Alameda County Waste Management Authority), California Association of School Business Officials (CASBO), and the League of California Cities (Cal Cities), we are pleased to support Assembly Bill 998 (Hadwick), regarding household hazardous waste (HHW) collection facilities.

Assembly Bill 998 seeks to help schools properly dispose of vapes confiscated from students, enable local HHW collection facilities to reduce program management costs, and increase recycling of electronic waste and batteries.

Local governments are responsible for the collection, processing, recycling and disposal of solid waste, including the operation of local HHW collection facilities. These local programs provide important public services and prevent improper disposal of hazardous waste.

Vapes

Single-use and refillable vapes are commonly encountered in the waste stream and must be managed as hazardous waste because they contain residual chemicals, batteries, and electronic components and sometimes cause fires. Schools often confiscate vape pens that students bring from home. While the student or parent can dispose of the vape pen as HHW at a HHW collection facility, it is not clear that schools can as well because the school is not a household and often generates too much hazardous waste to qualify as a very small quantity generator (VSQG). The school's action to take possession of contraband vape pens, especially when acting *in loco parentis*, should not change the vape pen's categorization as HHW. AB 998 provides another convenient pathway for schools to safely dispose of confiscated vapes by deeming those devices confiscated from students to be HHW, which can continue to be taken to and managed by HHW collection facilities. AB 998 does not require schools to use HHW collection facilities, nor does it compel HHW collection facilities to accept vapes – it merely provides more flexibility for schools and local governments to work together to safely manage this waste stream.

HHW Disassembly

Some HHW devices coming into HHW collection facilities include batteries, circuitry, fluid canisters, etc. Some of these devices, like vape pens and flexible wand lighters can quickly cause massive amounts of damage. It is unclear whether HHWCFs are allowed to disassemble vape pens to separate the batteries and electronic components from the cartridge/tank under their existing permits; however, this authority would significantly reduce management costs and safety risks. The Department of Toxic

Substances Control (DTSC) considers any change in the physical, chemical, or biological composition of hazardous waste (or any method/process that removes/reduces the harmful properties or characteristics of hazardous waste) to be hazardous waste "treatment." These common-sense activities (like disassembling a device to remove a battery) should not constitute "treatment" and HHW facilities should be allowed to safely disassemble HHW to separate and appropriately manage the different components of those devices without having to obtain much more expensive and burdensome hazardous waste treatment facility permits. AB 998 simply allows HHW collection facilities to safely disassemble HHW, including vapes, to separate batteries, valves, electronic components and other parts containing liquids or gases.

For these reasons, we are pleased to support AB 998 and urge your "aye" vote when this measure is heard before your committee.

Sincerely,

John Kennedy
RCRC
Senior Policy Advocate

Joanne Brasch
CPSC
Director of Advocacy and Outreach

Heidi Sanborn
NSAC
Executive Director

Dorothy Johnson
ACSA
Legislative Advocate

Sasha Horwitz
LAUSD
Legislative Advocate

Jordan Wells
CSAC
Legislative Advocate

Joe LaMariana
RethinkWaste
Executive Director

Paul Freund
Tehama County SWMA
Agency Manager

Tedd Ward, M.S.
Del Norte SWMA
Director

Curtis Larkin
SWANA California Chapters LTF
Chair

Veronica Pardo
RRCC
Executive Director

Timothy Burroughs
StopWaste
Executive Director

Sara E. Pietrowski
Chief Governmental Relations Officer
CASBO

Melissa Sparks-Kranz
Legislative Advocate
Cal Cities

cc: The Honorable Heather Hadwick, Member of the California State Assembly
Members of the Senate Environmental Quality Committee
Brynn Cook, Consultant, Senate Environmental Quality Committee
Scott Seekatz, Consultant Republican Caucus

June 10, 2025

The Honorable Damon Connolly
Chair, Assembly Committee on Environmental Safety and Toxic Materials
1020 N Street, Room 171
Sacramento, CA 95814

RE: SB 454 (McNerney) State Water Resources Control Board: PFAS Mitigation Program.
As amended on May 23, 2025 – Notice of SUPPORT
To be heard in the Assembly Committee on Environmental Safety and Toxic Materials on June 17, 2025

Dear Chair Connolly,

The California State Association of Counties (CSAC) and California Association of Environmental Health Administrators (CAEHA) write in **support** of SB 454 (McNerney), which would create the PFAS Mitigation Fund in the State Treasury to be used by the State Water Resources Control Board (State Water Board) to cover or reduce the costs of treating per- and polyfluoroalkyl substances (PFAS) in drinking water and wastewater.

According to studies by the National Institute of Environmental Health Sciences (NIEHS), the persistence and bioaccumulation of PFAS chemicals in the environment poses an array of health risks including increased risk of certain cancers, liver damage, immunotoxicity, and more. The Center for Disease Control (CDC) has found that PFAS impacts most of the population, with reports of PFAS found in the blood of 97% of Americans. Therefore, it is critical that PFAS exposure be mitigated to limit impacts on population health.

While some larger water municipalities have been able to implement mitigation strategies on their own, a lack of state funding leaves small and disadvantaged communities more vulnerable to the impacts of PFAS exposure. SB 454 would create a dedicated fund to address PFAS mitigation and allow the State Water Board to provide grants, loans, contracts,

or technical assistance services to water or sewer system providers to cover or reduce the costs associated with treating drinking water to meet state and federal standards.

For these reasons, CSAC and CAEHA are pleased to **support** SB 454. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org or Amanda Bloom (CAEHA) at anbloom@anbloominc.com.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association
of Counties

Amanda Bloom, MPH
Executive Director
California Association of Environmental Health
Administrators

CC : The Honorable Jerry McNerney, Member of the California State Senate

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 10, 2025

The Honorable Damon Connolly
Chair, Assembly Committee on Environmental Safety and Toxic Materials
1129 10th St, Room 444
Sacramento, CA 95814

RE: SB 615 (Allen) Vehicle traction batteries.
As amended on May 23, 2025 – Notice of SUPPORT
To be heard in the Assembly Committee on Environmental Safety and Toxic Materials on June 17, 2025

Dear Chair Connolly,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in **support** of SB 615 (Allen), which would make manufacturers responsible for the end-of-life (EOL) management of vehicle traction batteries.

As an early driver and adopter of zero emission vehicle (ZEV) technology, California is also at the forefront of dealing with the EOL management of electric vehicle (EV) batteries. In California, all batteries are considered hazardous waste at EOL. However, batteries are inherently valuable as they contain critical earth minerals that can be recycled and reused. If batteries are not handled properly at EOL, they also pose a potential environmental health and public safety hazard.

Batteries that are still under warranty are typically returned to the original equipment manufacturer (OEM) for repair or replacement, but if EV batteries are outside of their warranty, OEMS are not required to take them back. Therefore, a coherent state policy must be designed to ensure all vehicle traction batteries are reused, repaired, repurposed, remanufactured, and recycled.

SB 615 would require a battery supplier to be responsible for ensuring the proper EOL management of a vehicle traction battery if it is removed from a vehicle that is still in service, or if the vehicle traction battery is offered or returned to its battery supplier. SB 615 would also require reporting to the Department of Toxic Substances Control regarding the sale, transfer, or receipt of a vehicle traction battery or battery module.

CSAC Officers

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Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

For these reasons, CSAC **supports** SB 615. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

Sincerely,

Jordan Wells
Legislative Advocate
California State Association of Counties

CC : The Honorable Ben Allen, Member of the California State Senate

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 11, 2025

The Honorable Mike McGuire
Senate President pro Tempore

The Honorable Robert Rivas
Speaker, California State Assembly

The Honorable Monique Limón
Senate President pro Tempore- Elect

The Honorable Jesse Gabriel
Chair, Assembly Budget Committee

The Honorable Scott D. Wiener
Chair, Senate Committee on Budget and Fiscal Review

RE: 2025-26 Joint Legislative Budget Proposal and County Partnership

Dear Honorable Leaders of the California Legislature,

The California State Association of Counties (CSAC), proudly representing all 58 of the state's counties, writes to share our informed perspective on the Joint Legislative Budget Proposal for the 2025 Budget Act. Presently, the proposal partially reflects CSAC's recommendation that the Legislature continue to lead on resourcing counties to address homelessness and reduce crime to support the safety and wellbeing of our shared constituency, but falls short. Regrettably, this proposal continues the unreliable, piecemeal approach to addressing the most intractable crisis of our generation: homelessness. Long-term problems demand long-term solutions. California's counties, the state's primary service providers, and a critical partner for progress on homelessness, cannot meet state expectations in a state budget that does not fully fund the HHAP program, nor commit to continuing it in the future. **Uncertainty and reductions in funding require local government to defund successful programs. We cannot make progress on homelessness in an environment with no reliable state commitment yet with expectations and accountability as if funding continued.**

There is no bigger priority for CSAC than to be the collective voice of California's local leaders, and to protect counties, our communities, and our residents. In turn, throughout 2025 CSAC has submitted letters to the Legislature with detailed recommendations across critical policy and fiscal areas. Although CSAC represents 58 geographically, demographically, and economically diverse counties, the throughline of our letters is a unified voice from all local leaders: **we collectively urge a state budget plan that prioritizes the well-being and**

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
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Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

safety of all Californians and fully funds the HHAP program so that local government can continue the work to address homelessness.

We understand that state budget deliberations continue to occur in the shadow of federal instability, unpredictability, and the fiscal impacts of federal global trade policy. We recognize the current environment and associated challenges of this reality, including the effects on programs that serve California's most vulnerable populations. Whatever happens in the second half of 2025, county leaders are prepared to address the needs of their communities and meet challenges with adaptability and fortitude. Counties see a renewed opportunity for the state and local governments in California to come together on our shared priorities.

The 2025-26 Joint Legislative Budget Proposal demonstrates state/local partnership with the emergency relief package for local governments. We concur with the **Legislature's assertion that this investment in local governments will strengthen the state's economic outlook in the long-term.** This is true, even more so, regarding state investments in local governments to address homelessness and reduce crime; As the 2025-26 budget development process enters the final stage of negotiations, we urge you to remain a stalwart ally of local governments and offer the following recommendations to achieve this:

Homeless Housing, Assistance, and Prevention (HHAP) Program
Since 2019 the HHAP program has been funded in a piecemeal fashion, leaving local governments with no ongoing support to sustain these vital programs. The Joint Legislative Budget Proposal fuels additional uncertainty and makes it impossible to make long-term investments. Neither the Governor's May Revision nor the Legislature's proposal ensure vital housing and homeless programs currently funded under previous and existing HHAP funding rounds can be sustained. **This is unacceptable.** CSAC continues to advocate for an annual commitment of at least $1 billion in the state budget for the HHAP program in perpetuity.

Proposition 36
CSAC supports the inclusion of $65 million in 2025-26 for county implementation of Proposition 36. However, to meet the expectations of voters who overwhelmingly approved the initiative, CSAC continues to advocate for robust ongoing investments to address the increased demand on county departments. With the insight and expertise of local policy and direct service professionals, CSAC estimates an annual need of more than $200 million across several county departments to sufficiently enact Proposition 36. Specifically, as shared previously, this includes a range of $95 million to $213 million ongoing for behavioral health evaluations, treatment, and staffing; $47 million ongoing for probation departments to support the courts, conduct individualized assessments, and supervise an expanded caseload; and $120 million over three years for indigent defense service providers to improve the quality of representation by addressing legal, social, and economic challenges faced by their clients. $65 million for one fiscal year will not cover all of these costs.

Progress Together

We look forward to the passage of a 2025 Budget Act that commits to partnership and sufficient resources to achieve our shared priorities. Should you have any questions regarding the information outlined in this letter, please do not hesitate to contact us.

Respectfully,

Graham Knaus
Chief Executive Officer, CSAC

CC : Honorable Members, California State Senate
Honorable Members, California State Assembly
Honorable Members and Consultants, Senate Budget and Fiscal Review Committee
Honorable Members and Consultants, Assembly Budget Committee
Christopher Woods, Chief Fiscal Adviser, Budget Director, Office of Senate President pro Tempore Mike McGuire
Jason Sisney, Budget Director, Office of Assembly Speaker Robert Rivas
Elisa Wynne, Staff Director, Senate Committee on Budget and Fiscal Review
Christian Griffith, Chief Consultant, Assembly Budget Committee
Kirk Feely, Fiscal Director, Senate Republican Caucus
Joe Shinstock, Fiscal Director, Assembly Republican Caucus
Gabriel Petek, Legislative Analyst, Legislative Analyst's Office
Carolyn Chu, Chief Deputy Legislative Analyst, Legislative Analyst's Office

June 20, 2025

The Honorable Chair Durazno
Committee on Local Government
State Capitol Room 407
Sacramento, CA 95814

RE: AB 253 (Ward) California Residential Private Permitting Review Act: residential building permits
As amended on March 13, 2025 – Notice of Opposition Unless Amended
To be heard in the Local Government Committee on July 2, 2025

Dear Chair Durazo

On behalf of the California State Association of Counties (CSAC), the Rural County Representatives of California (RCRC) and the League of California Cities (Cal Cities), **regretfully must take a position of oppose unless amended on Assembly Bill 253**, which would allow applicants for certain residential building permits to bypass local building departments and instead hire private professional providers for plan-checking services if local review exceeds 30 days.

While we recognize the importance of encouraging housing production, AB 253 undermines the integrity and public accountability of California's building safety framework. Local building officials are uniquely qualified and mandated by law to uphold not only state and model codes, but also local ordinances tailored to the specific needs and safety concerns of their communities. City and county building departments play a crucial role in ensuring the safety and welfare of the communities they serve. Their reviews of plans and specifications ensure that overall building, life, and safety codes are followed holistically. Most importantly, the bill's provisions must be clarified to apply business days as the timeline measurement to allow local government staff adequate time to review the permits within the time periods which they have collectively bargained to work.

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Moreover, the bill's provision deeming permits "approved" if a local department fails to respond within 14 days of receiving a private reviewer's report is deeply concerning. This automatic approval mechanism could allow non-compliant or unsafe plans to proceed without adequate oversight, especially in complex or resource-constrained jurisdictions. Ensuring local governments are protected from liability is critical, especially as workloads have increased at the local level. Local governments are tasked with permitting and reviewing a variety of projects beyond housing due to new state laws and should not be held liable for actions beyond their control. Furthermore, this provision subjects local governments to liability for profit-motivated decisions made by housing developers to commence construction without the benefit of independent civic review.

AB 253 also fails to acknowledge the interconnected nature of local planning, community development, and building departments, which work collaboratively to ensure sustainable, equitable, and forward-looking development. By fragmenting this process, the bill prioritizes speed over quality and public interest.

For the reasons listed, we **regretfully must take a position of oppose unless amended** on AB 253. We appreciate the author's willingness to work with stakeholders to address these concerns and have proposed amendments that would remove our opposition. If you have any questions, please contact Brady Guertin (Cal Cities) at bguertin@calcities.org, Tracy Rhine (RCRC) at trhine@rcrcnet.org, or Mark Neuburger (CSAC) at mneuburger@counties.org

Sincerely,

Mark Neuburger
Legislative Advocate
CSAC

Brady Guertin
Legislative Affairs, Lobbyist
Cal Cities

Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

CC : Members, Senate Local Government Committee
The Office of Assemblymember Ward

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June 18, 2025

The Honorable Jerry McNerney
Chair, Senate Revenue and Taxation Committee
State Capitol, 410
Sacramento, CA 95814

RE: AB 258 (Connolly): Fairs: allocation of revenues: gross receipts for sales and tax use—As Amended April 30, 2025 - SUPPORT

Dear Chair McNerney,

On behalf of the California State Association of Counties (CSAC) representing all 58 California Counties, I write to support AB 258 (Connolly) which will increase the amount of funding for the fairs network in the Governor's Annual Budget to two percent of the gross receipts of taxable sales made on a fairground. This bill will provide funding closer to, but not equivalent to, the $8 million once guaranteed to the Network of California Fairs.

In recent years, California has experienced an increasing frequence and intensity of disasters, including wildfires, droughts, floods and public health emergencies. Each disaster disrupts entire communities, often exceeding the response capacity of local jurisdictions.

Counties play a critical role in disaster preparedness, response, and recovery. Fairgrounds serve as critical facilities during local and statewide emergencies, including during wildfires. CSAC supports local fair stability and improvements for community resilience and state funding to upgrade these facilities for emergency preparedness and disaster response.

Funding stability is critical to maintaining and improving California's fairgrounds. For these reasons, CSAC supports AB 258. Should you have any questions about our position, please do not hesitate to contact me at (916) 662-6400 or cfreeman@counties.org.

Sincerely,

Catherine Freeman
Senior Legislative Advocate
California State Association of Counties

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
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CEO Graham Knaus

June 17, 2025

The Honorable Lola Smallwood-Cuevas, Chair
Senate Labor, Public Employment and Retirement Committee
1021 O Street, Room 6740
Sacramento, CA 95814

RE: AB 283 (Haney) – IHSS Employer-Employee Relations Act
As Amended on June 12, 2025 – Support if Amended
Set for hearing June 18, 2025

Dear Chair Smallwood-Cuevas:

On behalf of the California State Association of Counties (CSAC) and the County Welfare Directors Association of California (CWDA), we are writing to share our Support if Amended position on AB 283 authored by Assembly Member Matt Haney. This legislation would transition collective bargaining for the In-Home Supportive Services (IHSS) program from counties to the state.

The IHSS program serves roughly 840,000 consumers in California and allows qualified aged, blind, or disabled persons to receive supportive services from a provider to help them live at home. IHSS services are delivered by roughly 750,000 providers. Counties have proudly partnered with the state on the IHSS program since it was realigned in 1991 and are committed to the success of this program, which has helped reduce care costs and improve the well-being of individuals.

Existing law deems a Public Authority (PA) as the employer of record for the purposes of collective bargaining for IHSS providers. This bill establishes the IHSS Employer-Employee Relations Act, which would shift collective bargaining for IHSS providers from counties and PAs to the state. Our associations have worked closely with the author and sponsors on a series of amendments to address county and PA concerns in three key areas – (1) Providing clarity that the state would be responsible for the nonfederal share of costs for wage and benefit increases agreed to in statewide bargaining; (2) Removing county and public authority administrative functions from the scope of representation in statewide bargaining; and (3) Ensuring full funding for counties to comply with any new program requirements agreed to in statewide bargaining.

We are appreciative of the collaborative engagement in being able to reach agreement on amendments that address these issues. Key amendments in the June 12 version of the bill include:

- Removing several items from the scope of representation that are core county and public authority administrative functions (provider registry, backup provider system, provider recruitment and retention).
- Adding county and public authority representatives to the advisory committee.
- Requiring consultation with those representatives about county and public authority programmatic and fiscal implications prior to finalizing a memorandum of understanding.
- Clarifying that the bill does not change any other aspect of the IHSS employment relationship.

In addition, the author has indicated agreement on two additional amendments and it's our understanding that they will be incorporated as the bill moves forward to the next committee. These amendments are:

> Amend Section 12306.16(e) of the Welfare and Institutions Code
> (e) The rebased County IHSS MOE shall only be adjusted pursuant to subdivisions (c) and (d). *There shall be no county IHSS MOE adjustments resulting from any provisions of any memorandum of understanding or addenda, appendices, or side letters thereto between the employer (the state) and recognized employee organizations as defined in Title 26 (commencing with Section 110000) of the Government Code.*
>
> Amend Section 12306.16(b)(3)(B) of the Welfare and Institutions Code
> (B) The state shall pay 100 percent of the allowable nonfederal share of county administration and public authority administration costs for each county. *Commencing on the effective date of Title 26 (commencing with Section 110000) of the Government Code, the state shall pay 100 percent of the nonfederal share of county administration and public authority administration costs for each county of any administration costs resulting from all provisions of any memorandum of understanding or addenda, appendices, or side letters thereto between the employer (the state) and recognized employee organizations as defined in Title 26 (commencing with Section 110000) of the Government Code.* Once the county's share of the appropriated General Fund moneys is exhausted, the county shall pay 100 percent of the remaining nonfederal share of county administration and public authority administration costs. Each county shall pay 100 percent of any costs for public authority administration that are in excess of the county's approved rate approved pursuant to subdivision (a) of Section 12306.1. At the end of the fiscal year, any remaining unspent General Fund moneys allocated for IHSS county administration or public authority administration shall be redistributed through a methodology

determined in conjunction with the County Welfare Directors Association of California or the California Association of Public Authorities.

The above amendments will provide clarity that counties would not be responsible for the increased costs that the state agrees to in statewide bargaining, including wage and benefit increases and new program requirements. This fiscal protection language is essential as counties would have no ability to manage the associated costs of statewide bargaining within Realignment funding and county budgets.

IHSS is a vital program for older adults and people with disabilities that families rely on to care for their loved ones. CSAC and CWDA believe that with the amendments outlined in this letter, AB 283 would transition collective bargaining to the state in a manner that would maintain the consumer-driven foundation of the IHSS program, mitigate for any fiscal, legal, and administrative impacts to counties, and help attract additional quality providers to sustain the growth of the program.

If you have any questions about our position, please don't hesitate to contact us. Thank you for your consideration.

Sincerely,

Justin Garrett
Senior Legislative Advocate
California State Association of Counties
jgarrett@counties.org

Carlos Marquez III
Executive Director
County Welfare Directors Association
cmarquez@cwda.org

cc: The Honorable Matt Haney, California State Assembly
Members and Consultants, Senate Labor, Public Employment and Retirement Committee

June 6, 2025

The Honorable Thomas Umberg
Chair, Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

RE: AB 370 (Carrillo): California Public Records Act: cyberattacks.
As Amended March 12, 2025 – SUPPORT
Set to be heard in the Senate Judiciary Committee June 17, 2025

Dear Chair Umberg,

The California State Association of Counties (CSAC); Urban Counties of California (UCC); Rural County Representatives of California (RCRC); the League of California Cities (Cal Cities); California Municipal Clerks Association (CMCA); Public Risk, Innovation, Solutions, and Management (PRISM); Association for California Healthcare Districts (ACHD), and California Association of Recreation and Park Districts (CARPD) are pleased to support Assembly Bill (AB) 370 by Assemblymember Juan Carrillo. This bill would amend the definition of "unusual circumstances," in the California Public Records Act (PRA) to include the inability of an agency to access its electronic servers due to a cyberattack.

The California Public Records Act serves as a vital tool for the public to hold their governments and elected leaders accountable. California's public agencies take their responsibilities under the PRA seriously, devoting substantial resources to responding thoroughly and promptly to public records requests.

Public agencies at all levels of government have reported a significant increase in the quantity and breadth of PRA requests. A variety of public agencies reported a 73% increase in the volume of PRA requests over the past five years. A vast majority of those agencies reported receiving PRA requests that required an inordinate amount of staff time, with more than 90% reporting PRA requests that diverted local resources away from local programs and services.

These requests can be costly and time-consuming for local agencies, as they can require significant staff time to discover, review, and redact records, often requiring the specific subject matter experts on an issue to dedicate substantial time outside of their core responsibilities to ensure the agency fully responds to a PRA request. Counties have reported single PRA requests seeking decades of 911 call transcripts or decades of correspondence from local officials. One small, rural county reported a single requester who has submitted hundreds of PRA requests over the past few years, including a single request that required the county to review over 621,000 records. The county estimates that responding to a portion of the requests would cost the county over $1.8 million and require a minimum of 34 employees working around the clock for a year to honor the request.

Furthermore, due to the modernization of how public sector work is conducted, there has been a significant increase in disclosable records (e.g., emails, text messages, inter-office direct chat messaging platforms, etc.) created by routine government work. In response, there has been a proportionate increase in the complexity and sophistication of the work necessary to respond to PRA requests due to the staff time spent searching for records and redacting material that is exempt or prohibited from disclosure (e.g., confidential attorney-client correspondence, social security numbers, criminal history, trade secrets, medical records, etc.).

The heightened use of the PRA – and the subsequent heightened impacts to governments – has occurred over the same period that saw local governments lose revenue sources that absorbed some of the cost pressures of PRA requests.

In 2014, California voters approved Proposition 42, which, among other provisions, amended the California constitution to discontinue the requirement that the State reimburse local governments for the cost to comply with PRA laws or any subsequent PRA laws enacted by the Legislature. Prior to Proposition 42, costs for local governments to comply with the PRA were a reimbursable state mandate for which local governments could file annual claims with the State Controller's Office.

In 2020, the California Supreme Court ruled that local agencies cannot charge for staff time and technical costs necessary to review, redact, and release public records in response to PRA requests, allowing fees to be used only for limited circumstances – including, for example, $0.10 per page for physical copies, the cost of physical hardware used to transmit records, or the cost of data extraction. Agencies are not allowed to seek reimbursement for the significant costs that can be incurred for the time spent by legal counsel in reviewing and explaining the legality of a claim, exemptions, or redactions applicable to the request – or the staff time spent redacting private information from voluminous records requests.

AB 370 will provide some narrow, limited relief to counties when they receive PRA requests that are inaccessible due to a cyberattack. While other reforms to the PRA could both improve public access to records and reduce impacts on local agencies, we appreciate any effort to reform the PRA, including this narrow, but beneficial improvement.

For these reasons, CSAC, UCC, RCRC, Cal Cities, and CMCA support AB 370 and respectfully request your AYE vote. Should you have any questions or concerns regarding our position, please do not hesitate to contact us.

Sincerely,

Eric Lawyer
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elawyer@counties.org

Jean Kinney Hurst
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Sarah Dukett
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Johnnie Pina
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Ethan Nagler
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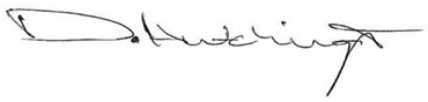
enagler@publicpolicygroup.com



Dane Hutchings
Legislative Representative
California Association of Recreation and Park Districts
dhutchings@publicpolicygroup.com

Sarah Bridge
Vice President, Advocacy & Strategy

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Chief Legal Counsel, Public Risk Innovation Solutions and Management (PRISM)

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cc: The Honorable Juan Carrillo, California State Assembly
Members, Senate Judiciary Committee
Margie Estrada, Chief Counsel, Senate Judiciary Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 16, 2025

The Honorable Steve Padilla
Chair, Senate Committee on Governmental Organization
1020 N Street, Suite 584
Sacramento, CA 95814

RE: AB 372 (Bennett) Office of Emergency Services: state matching funds: water system infrastructure improvements.
As Amended April 21, 2025 - SUPPORT

Dear Senator Padilla,

On behalf of the California State Association of Counties (CSAC) representing all 58 California Counties, I write to support AB 372 (Bennett) which would establish the Rural Water Infrastructure for Wildfire Resilience Program within the Office of Emergency Services (OES). This program would build upon the successful home hardening efforts by providing state matching funds to communities within the Wildland Urban Interface (WUI) in high and very-high fire severity zones to improve water infrastructure.

In recent years, California has experienced an increasing frequency and intensity of disasters, including wildfires. Each disaster disrupts entire communities, often exceeding the response capacity of local jurisdictions. Counties play a critical role in disaster preparedness, response, and recovery. Local governments are often the first to respond, triggering state and federal aid while leading long-term rebuilding efforts.

CSAC's disaster advocacy focuses on improvements to water resilience and disaster prevention. Counties are often the first responders when a community runs out of water due to drought or water supply disruption. Water infrastructure improvements in rural and WUI areas of the state are necessary not only to buffer drought and flood years, but also as a safeguard during wildfire events. SB 372 will support these goals through upgrading waterlines, increasing connected water systems, and enhancing water delivery in our most vulnerable areas.

For these reasons, CSAC supports AB 372. Should you have any questions, please contact me at cfreeman@counties.org.

Sincerely,

Catherine Freeman
Senior Legislative Advocate

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

California State Association of Counties

June 20, 2025

The Honorable Chair Boerner
Committee on Communications and Conveyance
1020 N St, Room 169
Sacramento, CA 95814

RE: AB 470 (McKinnor) Telephone corporations: carriers of last resort
As amended on June 19, 2025 – Removal of Opposition, Neutral
To be heard in the Communications and Conveyance Committee on June 23, 2025

Dear Chair Boerner,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California we are writing to share that CSAC is **removing our opposition to AB 470** and now has a **neutral** position on the bill. We appreciate the author's office and sponsors engagement and willingness to work with local government stakeholders on this bill to accept a variety of suggested amendments.

CSAC believes that it is critical for all county residents to have access to essential communication services and that county residents and community leaders should have access to reliable communications networks to respond to emergencies, particularly when there is an electrical power outage. Additionally, CSAC strongly advocates for broad county access to technology and infrastructure that offer effective and wide-ranging communications capabilities for alerting the public in emergency situations. Also, CSAC supports the expansion of modern communications technologies to all parts of the state as a means to drive economic development and job opportunities, support county service delivery, and improve health, education, and public safety outcomes for community members.

For the reasons listed, we are **removing our opposition** to AB 470 and taking a **neutral position** on the current version of the bill. We appreciate the author's and sponsors willingness to work with us to address our past concerns on this bill. If you have any questions, please contact Mark Neuburger at mneuburger@counties.org

CSAC Officers	President	1st Vice President	2nd Vice President	Past President	CEO
	Jeff Griffiths Inyo County	Susan Ellenberg Santa Clara County	Luis Alejo Monterey County	Bruce Gibson San Luis Obispo County	Graham Knaus

Sincerely,

Mark Neuburger
Legislative Advocate
CSAC

CC : Members, Assembly Communications and Conveyance Committee
The Office of Assemblymember McKinnor
Chase Hopkins, Policy Consultant, Office of Assembly Speaker Robert Rivas
Daniel Ballon, Policy Consultant, Assembly Republican Caucus

June 19, 2025

The Honorable Lola Smallwood-Cuevas
Chair, Senate Labor, Public Employment and Retirement Committee
1021 O Street, Room 6740
Sacramento, CA 95814

RE: AB 538 (Berman): Public works: payroll records
As Introduced February 11, 2025 – OPPOSE
Set to be heard in the Senate Labor, Public Employment and Retirement June 25, 2025

Dear Senator Smallwood-Cuevas,

The California State Association of Counties (CSAC), League of California Cities (Cal Cities), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC) respectfully oppose Assembly Bill (AB) 538 because it would place an unnecessary burden on local agencies.

Current law requires contractors and subcontractors for public works projects to maintain payroll records for all workers employed as part of a public works project. Current law also requires that a certified copy of those records be made available upon request by either a body awarding the contract (e.g. a county or city) or by the Division of Labor Standards and Enforcement (DLSE). Current law empowers DLSE, not awarding bodies, to penalize contractors or subcontractors for failing to respond to a records request by either an awarding body or DLSE. Despite this reality, the bill only requires local agencies to seek out records not in their possession and lacks any language to compel the only body with enforcement powers to seek out the records.

Additionally, Section 2 declares that the bill is not a reimbursable state mandate, asserting that the only costs incurred by a local agency or school district will be due to changes to a crime or infraction. We believe the language is inappropriate and should be amended to clearly declare that the bill would establish a new mandate reimbursable under state law, as the bill clearly mandates a new activity by local agencies: seeking records from a public works contractor or subcontractor when the local agency is not in possession of those records.

We believe this bill unnecessarily adds to the administrative burdens of local agencies at a time when their resources are being further stretched due to increasing state mandates, emergency response, and federal uncertainty.

For these reasons, CSAC, UCC, RCRC and Cal Cities regretfully oppose AB 538 (Berman) and respectfully request your NO vote. Should you have any questions or concerns regarding our position, please do not hesitate to contact us.

Sincerely,

Eric Lawyer
Legislative Advocate

Jean Kinney Hurst
Legislative Advocate

California State Association of Counties
elawyer@counties.org

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

Urban Counties of California
jkh@hbeadvocacy.com

Damon Conklin
Legislative Advocate
League of California Cities
DConklin@calcities.org

cc: The Honorable Marc Berman, California State Assembly
Members, Senate Labor, Public Employment and Retirement Committee
Alma Perez, Chief Consultant, Senate Labor, Public Employment and Retirement Committee
Cory Botts, Consultant, Senate Republican Caucus

June 17, 2025

Senator Jesse Arreguín
Chair, Senate Committee on Public Safety
1020 N Street, Room 545
Sacramento, CA 95814

RE: AB 690 (Schultz) Criminal procedure: indigent defense compensation.
As Amended May 23, 2025 – OPPOSE.
Set to be heard June 24, 2025 – Senate Committee on Public Safety.

Dear Chair Arreguín,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we write in respectful opposition to Assembly Bill (AB) 690 (Schultz). While we share the overarching policy intent, this bill would create additional mandates for the provision of indigent defense services, which will result in further challenges for counties to ensure the highest quality criminal defense representation.

The California and U.S. Constitution enshrine the right to effective assistance of legal counsel and equal protection through due process for all criminal defendants. In California, the state has delegated this responsibility of both funding and administering indigent defense services at the trial court level to all 58 individual counties. As such, counties retain both the authority and flexibility to structure their defense systems in a manner that best suits local needs. Simply put, AB 690 runs counter to this notion of local authority and flexibility over programs and services delegated by the state.

First, this measure would require counties to adhere to recently published standards drafted by the Office of the State Public Defender (OSPD), whose mission is to provide support and technical assistance to counties, rather than develop rules on how county government administers indigent defense services. The ten new standards impose vast changes around leadership, organizational structure, classification of attorneys, defense panel procedures, program oversight and guidance, training and attorney development, data collection, access to resources, attorney compensation, and attorney-client communication. All counties are not equipped with the resources to meet the stringent and comprehensive strategies absent further state support.

Additionally, this bill would establish a number of expansive new requirements counties must incorporate into any contractual agreement with private firms and non-county attorneys. This includes, but is not limited to, access to funding for ancillary services on top of general attorney compensation – investigators, social workers, immigration counsel, as well as payment for paralegals, case support services, and mitigation specialists. In light of shrinking local and state general funds, ongoing federal uncertainty, and expanded and higher levels of service demanded of counties – again, without a sustained source of new funding – such requirements may be unachievable in many counties.

Perhaps most critical, this measure would establish a blanket prohibition on the utilization of flat fee or per-case compensation models when contracting out or administering indigent defense services. This would have an immediate and direct impact, particularly in the hardest to serve areas of our state, where it is increasingly difficult to recruit experienced criminal defense counsel. For example, in counties where a flat fee contract model is utilized, attorneys express support for the security it provides during periods when there may be a declining caseload. It affords both counties and defense attorneys the contractual security required to provide a consistent level of service for all clients, year around.

Overall, the combined provisions in AB 690 dramatically reduce county authority over the constitutionally mandated service that the state has delegated to counties, without meaningful funding. Further, it eliminates county-by-county flexibility to structure contracts in a way that adapts to the local challenges in jurisdictions across the state that already experience a shrinking pool of qualified defense attorneys. And most notably, the changes proposed in this bill do so without identifying practical and alternative models that would meet the fiscal restrictions of any given county, nor does it demonstrate that an alternative model will inevitably yield better results.

While counties adamantly share the underlying intent of AB 690 – to ensure there are manageable caseloads for defense attorneys and high-quality representation for every client statewide – the bill as written imposes considerable mandates that are not only extremely costly and burdensome, but includes requirements that are not even feasible given the diverse challenges facing our 58 unique counties with regards to population, geography, crime trends, workforce shortages, and budgetary constraints. Ultimately, before we pursue policy changes around the structure of local defense systems, attorney contracts or compensation, and additional state reporting, we respectfully request the necessary funding to support the provision of indigent defense services that will result in more productive discussions around larger system changes that this bill demands.

For these reasons, CSAC, UCC and RCRC regretfully must continue to oppose AB 690. Should you have any questions regarding our position, please do not hesitate to contact Ryan

Morimune, (rmorimune@counties.org), Elizabeth Espinosa (ehe@hbeadvocacy.com), or Sarah Dukett (sdukett@rcrcnet.org).

Sincerely,

Ryan Morimune Senior Legislative Advocate, CSAC	Elizabeth Espinosa Legislative Advocate, UCC	Sarah Dukett Policy Advocate, RCRC

CC: Members and Consultants, Senate Committee on Public Safety
The Honorable Nick Schultz, California State Assembly

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 16, 2025

The Honorable Thomas Umberg
Chair, Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

RE: Support for AB 859 (Macedo) – Civil Procedure: recovery of defense costs.
As Introduced February 21, 2025 – SUPPORT
Set to be heard in Senate Judiciary Committee – June 24, 2025

Dear Chair Umberg,

I am writing on behalf of the California State Association of Counties (CSAC) to express support for **AB 859 (Macedo),** which would allow counties to recoup legal costs from defending meritless lawsuits.

Existing law does not allow defendants to recover legal costs when they file for a demurrer and get dismissed from a lawsuit. Counties and other government entities often face lawsuits where they are improperly named as defendants, requiring them to allocate significant funds to legal defenses. Local governments waste precious taxpayer dollars on lawsuits that they should not be named on.

AB 859 (Macedo) offers a commonsense solution by allowing local governments to recover the legal costs incurred when they file for a demur and are subsequently dismissed from a lawsuit. Allowing cost recovery when a demur is granted will help discourage the filing of frivolous lawsuits and ensure taxpayer dollars are directed toward essential community services.

CSAC supports AB 859 (Macedo), because it will reduce legal costs to local governments, save taxpayer dollars, and promote more efficient use of local resources.

For these reasons, CSAC respectfully requests an "AYE" vote on AB 859 (Macedo). Thank you for your time and consideration.

Sincerely,

Eric Lawyer
Legislative Advocate

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

California State Association of Counties
elawyer@counties.org

Cc: The Honorable Alexandra Macedo, Member of the California State Assembly
Members and Staff, Senate Judiciary Committee
Margie Estrada, Chief Counsel, Senate Judiciary Committee
Morgan Branch, Consultant, Senate Republican Caucus

June 11, 2025

The Honorable Lola Smallwood-Cuevas
Chair, Senate Labor, Public Employment and Retirement Committee
1021 O Street, Room 6740
Sacramento, CA 95814

RE: **AB 1293 (Wallis) – Qualified Medical Evaluator Report Quality**
SUPPORT, AS AMENDED 4/9/2025

Dear Chair Smallwood-Cuevas,

The undersigned organizations are pleased to **SUPPORT AB 1293**, which will improve the quality of medical-legal evaluations necessary to resolve disputes in the workers' compensation system.

According to the Commission on Health and Safety and Workers' Compensation's (CHSWC), in 2023 California's workers' compensation system covered 16.7 million employees who reported a total of 748,982 occupational injuries and illnesses with a total cost of $22.3 billion.[1] California's worker's compensation system is known to be expensive, complex, and litigious.

The various parties in the system – claims administrators, doctors, injured workers, attorneys – experience a wide range of disputes that need to be resolved quickly and effectively to avoid delays. Some disputes require the use of the state-administered Panel QME Process, whereby the Division of Workers' Compensation sends a panel of three independent doctors who are available to complete a medical legal report to resolve the dispute. In 2022 the state received 192,600 requests for QME Panels and assigned 141,239 Panels[2]. These are not minor disputes

[1] CHSWC 2023 Annual Report, Page 30
[2] CHSWC 2023 Annual Report, Page 117

being resolved – these reports determine whether temporary disability continues, whether a requested medical treatment is appropriate, or how much permanent impairment a worker has suffered from the injury.

Unfortunately, the Panel QME reports are frequently inadequate for the purpose of resolving disputes in the system. Resolution of disputes is frequently delayed so a supplemental report can be prepared or so the parties can depose the Panel QME. These delays harm injured workers and increase costs for employers. AB 1293 seeks to improve the quality of Panel QME reports with the aim of resolving disputes faster. Specifically, the bill requires the Division of Workers' Compensation (DWC) to take three actions:

- **Implement State Auditor's Recommendation for Evaluating QME Report Quality**
  In 2019 the legislature asked the California State Auditor to evaluate the Panel QME system. One recommendation from the auditor was for the DWC to create and implement a plan to review the quality and timeliness of reports so that the state can ensure efficient resolution of workers' compensation claims. AB 1293 creates a statutory requirement for the DWC to implement this recommendation and ensure that Panel QME reports are timely, complete, and sufficient to resolve disputes. The bill also requires that the required annual reports are made available to the public.

- **Develop a Template Panel QME Request Form**
  Labor Code Section 4062.3 outlines the types of information that can be provided to Panel QMEs and the process for doing so. Despite these guidelines, QMEs often receive incomplete or inadequate case information, which can compromise the accuracy and utility of their reports. AB 1293 requires the DWC to create and make available a template Panel QME request form that will help guide system stakeholders to provide the relevant information to medical evaluators.

- **Create a Template for Panel QME Reports**
  To improve the clarity and consistency of Panel QME evaluations, AB 1293 directs the DWC to develop and distribute a standardized QME report template. When used alongside more complete request submissions, this measure will facilitate the production of higher-quality medical reports, thereby reducing the need for costly and time-consuming follow-ups.

All the actions described above would be subject to the Administrative Procedures Act so that injured workers, labor representatives, doctors, employers, and other stakeholders are given thorough opportunity to contribute as the processes are developed and implemented. There is, of course, a cost to the state to have the DWC implement AB 1293, but all costs for the DWC are paid by direct fees on employers and there is no general fund impact.

For these reasons, we are proud to **SUPPORT AB 1293**.

Sincerely,

Acclamation Insurance Management Services (AIMS)
Agile Occupational Medicine
Allied Managed Care (AMC)
Association of California Healthcare Districts
California Alliance of Self-Insured Groups, Inc.
California Association of Joint Powers Authorities
California Attractions and Parks Association
California Chamber of Commerce
California Coalition on Workers' Compensation (CCWC)
California Joint Powers Insurance Authority
California League of Food Producers (CLFP)
California Restaurant Association
California State Association of Counties
Coalition of Small and Disabled Veteran Businesses
Flasher Barricade Association (FBA)
Keenan
Public Risk, Innovation, Solutions and Management (PRISM)
Rural County Representatives of California
Self-Insured Schools of California
Urban Counties of California

CC: The Honorable Greg Wallis, California State Assembly
Members and Consultants, Senate Labor, Public Employment, and Retirement Committee

June 20, 2025

The Honorable Lola Smallwood-Cuevas
Chair, Senate Committee on Labor, Public Employment and Retirement
1021 O Street, Room 6740
Sacramento, CA 95814

Re: **AB 1331 (Elhawary): Workplace surveillance**
Based on unpublished amendments – OPPOSE
Set to be heard in Senate Committee on Labor, Public Employment and Retirement June 25, 2025

Dear Chair Smallwood-Cuevas,

On behalf of the California State Association of Counties (CSAC); Urban Counties of California (UCC); Rural County Representatives of California (RCRC); Public Risk Innovation, Solutions, and Management (PRISM); California Special Districts Association (CSDA); Association of California School Administrators (ACSA); and the League of California Cities (Cal Cities), we write in respectful opposition to AB 1331 (Elhawary), which would vastly complicate the routine work of local governments, endanger our ability to perform essential public services, impede our ability to manage and respond to workplace violence threats, and make local governments vulnerable to waste, fraud, and abuse of public resources.

Needlessly endangers public employees and those they serve
Even with the proposed amendments, AB 1331 would needlessly interfere with the ability of local agencies to protect foster children, keep kids safe in schools, and maintain the safety of their workforce or the communities they serve—including election facilities, libraries, and shelters for the unhoused. The unpublished amendments allow for the use of surveillance tools if "required by state and federal law or regulations". While this amendment may allow *some* facilities to continue to use necessary security tools, it is unclear the extent to which this amendment will allow public agencies to protect critical infrastructure and government facilities. Put simply, state and federal laws are rarely prescriptive about the use of security tools – the need for security is implicit. Further, this attempt to exclude certain locations, including airports, from the law's provisions is a clear acknowledgement that AB 1331 creates security gaps for critical facilities.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life and appreciate that one could imagine the appropriate limits are needed to prevent employers from snooping into the private lives of their employees. However, the scope of this bill is vast and would deem basic security tools used for everyday work, including security cameras, collaboration tools like Teams or Slack, or GPS tools used to track fleets, to be "surveillance tools" whose use could be constricted by this bill by allowing employees to "leave behind," those tools when entering certain locations or during meal or rest periods or restricting the locations where they can be used. Under AB 1331, any device that collects or facilitates collection of data of an employee's movements, actions, communications, or behaviors, is deemed a surveillance tool that cannot be used when employees are off duty or in "employee only" areas.

AB 1331 will needlessly endanger public workforces and severely impair our ability to prevent and investigate instances of workplace violence. The bill restricts the ability for public agencies to review data collected through a surveillance tool in any "off-duty area," defined to include breakrooms and cafeterias unless directed by a court order or upon request by either a court, law enforcement, or by an employee. These restrictions needlessly inhibit the use of tools that can be used to keep employees safe from workplace violence incidents or, worse, provide the worst actors with a roadmap of locations where they can more easily hide bad behavior, including abuse of vulnerable populations like children, the elderly, or those experiencing mental health crises.

Under AB 1331, employees must be allowed to leave behind surveillance tools during off-duty hours or when they are entering off-duty areas. It's unclear how these rules would apply to a variety of tools that public employees may be required to use, including emergency alarms for teachers, body cameras for law enforcement, or tools used for public vehicle fleets, including dash cameras, speed monitors, or GPS tracking. The ability for an employee to claim they had simply been "at rest," will give those who are rightfully required to wear surveillance tools an easy out for any behavior that conflicts with laws or agreements that require wearable tools for public and employee safety.

Unfortunately, we have seen rising hostility and threats against government entities and their workforces. That includes violence and threats of violence against government employees whose job requires them to serve the public, like library staff, teachers, firefighters, benefits officers, among myriad other examples. It also includes public officials who are frequently targeted with threats or actual violence, including election workers, health officers, and public officials. AB 1331 would heighten vulnerability for public servants at a time of strong anti-government sentiment.

Amendments raise new privacy and cost concerns

The ability for employees to request video footage also raises critical privacy concerns about the disclosure of those in the footage, placing public agencies in the difficult position

of potentially violating an employee's privacy or incurring considerable costs to blur or pixelate the images of those in the footage.

Significantly expands government liability
To compound all of our concerns, AB 1331 imposes severe financial penalties for non-compliance. For public agencies, these penalties can be staggering and severely impact funds needed to provide essential public services. At a time of significant budget constraints at the state and local level, now is not the time to subject public agencies to nuclear fines for providing basic security measures.

Inappropriately applies to public agencies
We understand the sponsors are advancing this bill to address activities by private employers that use security tools to undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union activities. For example, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Put simply, public agencies use the "surveillance tools" defined in this law to protect public resources, employees, and the public – not to influence employee organization activities. We once again urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1331 and urge your "NO" vote.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
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Legislative Advocate
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Sarah Dukett
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Aaron Avery
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Johnnie Piña
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League of California Cities
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Dorothy Johnson, Legislative Advocate
Association of California School Administrators
djohnson@acsa.org

CC: The Honorable Sade Elhawary, Member, California State Assembly
Members and Consultants, Senate Committee on Labor, Public Employment and Retirement

June 10, 2025

The Honorable Maria Elena Durazo, Chair
Senate Local Government Committee
1021 O Street, Suite 7530
Sacramento, CA 95814

Re: **AB 1430 (Bennett): County recorders: fees**
As amended 3/17/25 – SUPPORT
Set for hearing 6/18/25 – Senate Local Government Committee

Dear Senator Durazo:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Counties (CSAC), we write to share our support for Assembly Bill 1430, a measure that updates and modernizes the statutory fees for county recorders' services. Across the state, county recorders provide important public services and serve as the custodian of vital records, recorded land documents, and other legal documents that support the integrity of property ownership and other legal transactions.

County recorders' offices operate on a fee-for-service basis; however, their fees are outlined in statute with maximum amounts that were set in 2009. The current fee structure disregards cost increases and changes in real estate transactions, resulting in some county recorders requiring additional county general fund resources to maintain operations.

AB 1430 updates the maximum fee a county recorder may charge for recording the first page of a document from $10 to $15 and additional pages from $3 to $4. These adjustments that are proposed are consistent with relative increases in the Consumer Price Index and still must reflect cost recovery. Further, AB 1430 requires that the fees collected are dedicated to, and solely utilized for, the county recorder's office, and prohibits the fees from exceeding the reasonable costs of the document recording function. While counties generally would prefer flexibility in directing such fees, the county recorders' offices fees are so woefully out of date, we recognize the utility of such a provision.

AB 1430 is an important measure to ensure that services provided by county recorders' offices are not subsidized by the general public through a reasonable update to statutory maximum fees. We greatly appreciate your "aye" vote on this important measure.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
jkh@hbeadvocacy.com

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

cc: Members and Consultants, Senate Local Government Committee
The Honorable Steve Bennett, California State Assembly

June 18, 2025

The Honorable Liz Ortega
Chair, Assembly Labor and Employment Committee
1020 N Street, Room 155
Sacramento, CA 95814

Re: **SB 7 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended May 1, 2025)*

Dear Assembly Member Ortega:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, and Association of California Healthcare Districts, write in respectful opposition to Senate Bill (SB) 7, which would complicate the routine work of local governments without a clear need.

SB 7 May Widely Apply to Many Technologies
We understand the reasonable concerns about the slow creep of new technologies into daily life. However, the scope of this bill is vast and would deem banal tools used for everyday work to be Automated Decision Systems (ADS) whose use could be covered by this bill. Given the bill's broad scope, the burdens from compliance with its notification and appeal requirements are significant.

SB 7 is an Unfunded Mandate on Local Budgets
The initial and ongoing reporting obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. The same is true of the requirements around human review and a mandatory appeals process. Some small agencies may struggle to comply with the bill's requirements concerning review and appeals. The bill's enforcement provisions expose local governments to increased litigation risk and costs. These constitute unfunded mandates on public employers without a clear need.

Applying SB 7 to Public Employers May Lead to Unintended Consequences
Local governments are responsible for operating and securing critical infrastructure, jails, hospitals, and police and fire departments. It is not difficult to envision scenarios where access to ADS data, or information about ADS systems employed by local governments, may undermine safety and efforts to protect public resources from waste.

For public employers with represented workforces, use of technology tools is often bargained between employees and public employers based on local conditions, security needs, and the concerns of the public workforce. State law already prohibits public employers from using workplace technology tools like ADS to deter or discourage union membership. Specifically, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Put simply, for public employers, the burdens potentially imposed by this bill exceed any need. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, our organization must respectfully oppose SB 7. Please feel free to contact us at any time with questions or to further discuss our position.

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
aarona@csda.net

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties
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Jean Kinney Hurst
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Sarah Dukett
Policy Advocate
Rural County Representatives of California
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Sarah Bridge
VP, Advocacy & Strategy
Association of California
Healthcare Districts
sarah.bridge@achd.org

CC: The Honorable Jerry McNerney
Members, Assembly Labor and Employment Committee
Erin Hickey, Principal Consultant, Assembly Labor and Employment Committee
Lauren Prichard, Consultant, Assembly Republican Caucus

June 17, 2025

The Honorable Ash Kalra
Chair, Assembly Judiciary Committee
1020 N St, Room 104
Sacramento, CA 95814

RE: Senate Bill 303 (Smallwood-Cuevas) – SUPPORT
As Amended May 1, 2025

Dear Chair Kalra,

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Urban Counties of California (UCC), we are pleased to support Senate Bill 303 (Smallwood-Cuevas), which protects the confidentiality of personal reflections shared during bias mitigation training. This bill ensures that if a public employee shares or acknowledges personal bias as part of required training, that information cannot be used against them in civil or administrative legal actions.

SB 303 encourages open and honest participation in training by making sure employees can reflect without fear of legal consequences. At the same time, the bill still allows evidence of actual misconduct—like discrimination or harassment—to be used when necessary.

For these reasons, RCRC, CSAC and UCC respectfully request your "Aye" vote when this bill is heard before your committee. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org

Eric Lawyer
Legislative Advocate
CSAC
elawyer@counties.org

Jean Kinney Hurst
Legislative Advocate
UCC
jkh@hbeadvocacy.com

cc: The Honorable Lola Smallwood-Cuevas, Member of the California State Senate
Members of the Assembly Judiciary Committee
Alison Merrilees, Chief Counsel, Assembly Judiciary Committee
Daryl Thomas, Consultant, Assembly Republican Caucus

June 17, 2025

The Honorable Mia Bonta
Chair, Assembly Health Committee
1020 N Street, Room 390
Sacramento, CA 95814

RE: Senate Bill 331 (Menjivar) – OPPOSITION

Dear Chairwoman Bonta,

On behalf of the County Behavioral Health Directors Association (CBHDA), the California State Association of Counties (CSAC), the California State Association of Public Administrators, Public Guardians and Public Conservators (CAPAPGPC), Mental Health America of California (MHAC), Cal Voices, the California Youth Empowerment Network (CAYEN), and LGBTQ+ Inclusivity, Visibility, and Empowerment (LIVE), we write to share our **opposition to Senate Bill 331 (Menjivar).** SB 331 proposes to define "mental health disorder" for the purposes of administering the Lanterman-Petris-Short (LPS) Act as *any* condition outlined in the Diagnostic and Statistical Manual of Mental Disorders (DSM) which would result in a significant and inappropriate expansion of the types of conditions that could fall under LPS.

The DSM is a publication of the American Psychiatric Association (APA), which provides criteria for clinicians to diagnose a wide range of mental health, substance use disorder, neurocognitive, and neurodevelopmental conditions. The DSM is periodically updated to reflect how our understanding of these conditions evolves over time. For example, the DSM incorporates everything from how to diagnose restless legs syndrome and autism, to caffeine use disorder, and schizophrenia. The types of conditions outlined in the DSM, along with our understanding of how best to treat them has changed over time.

While the proponents of this bill have cited a desire to ensure that the LPS Act is more consistently applied, this change in definition would actually lead to greater confusion in practice on the ground, as this expanded definition would require counties to consider how to arrange and deliver services to individuals with neurocognitive or neurodevelopmental conditions. By incorporating all the conditions in the DSM, this more specific definition would create a set of duplicative structures for the involuntary treatment of individuals with a range of overlapping physical, neurocognitive and neurodevelopmental conditions, many which often fall under, probate law and are treated through physical health plans or regional centers, not county behavioral health.

Utilizing the DSM in its entirety for purposes of defining "mental health disorder" under LPS would not provide clarity, instead, it would provide further ambiguity when assessing individuals for holds as well. If people with primary neurocognitive or neurodevelopmental disorder could now be considered for an LPS hold or conservatorship, their detention under LPS could be indefinite, as county behavioral health does not have the right expertise to address those conditions. This indefinite detention under LPS runs counter

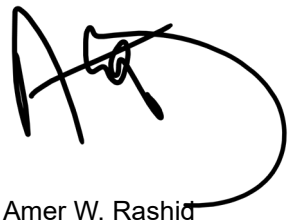
to the underlying intent of the LPS Act, which was to end the indefinite involuntary detention of individuals and guarantee due process rights.

Currently, counties interpret “mental health disorder” to align with 60 years’ worth of implementation of the Act which historically and today means those mental health conditions that are treatable through county behavioral health safety net services. Counties do not consider it necessary or appropriate to expand the definition to be inclusive of all the possible diagnoses that may at any point emerge in the DSM. We are also concerned that any attempt to further define “mental health disorder” in statute will potentially have unintended consequences, which either greatly expand or restrict our authority and may lead to additional legal challenges, and ultimately hamstring counties’ ability to apply LPS in the ways that were intended, for the safety and wellbeing of individuals and communities alike.

Finally, we are concerned that the effect of this bill will be to significantly expand the reach of LPS to a much broader range of conditions, including ones that are treated outside of the county behavioral health system and as such constitute a significant unfunded mandate for counites.

For these reasons above, our organizations are **opposed to SB 331 (Menjivar) and respectfully request your “No” vote**. For questions, please feel free to contact our respective organizations.

Sincerely,



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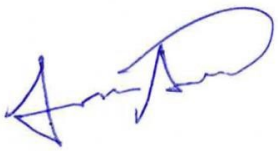

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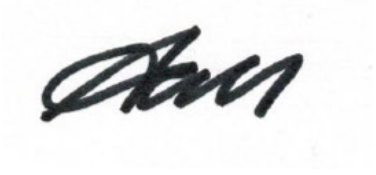

Anthony Garibay-Mena
LGBTQ+ Inclusivity, Visibility, and Empowerment
Program Manager
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Meron Agonafer

Meron Agonafer
Policy Director
Cal Voices
magonafer@calvoices.org

CC: Honorable Senator Menjivar
Honorable Members of the California State Assembly
Logan Hess, Principal Consultant, Assembly Health Committee
Alison Merrilees, Chief Counsel, Assembly Judiciary Committee
Rosielyn Pulmano, Policy Consultant, Office of the Speaker of the Assembly
Marjorie Swartz, Principal Consultant, Office of the Senate President pro Tempore
Justin Boman, Consultant, Assembly Republican Caucus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 18, 2025

The Honorable Mike Gipson
Chairman, Assembly Revenue and Taxation Committee
1021 N St., Room 167A
Sacramento, CA 95814

RE: SB 359 (Niello) Use Fuel Tax Law: Diesel Fuel Tax Law: exempt bus operation
As amended on April 8, 2025 – Notice of Support
To be heard on June 23, 2025

Dear Chairman Gipson,

On behalf of the California State Association of Counties (CSAC), I write in support of SB 359, which establishes clearer guidelines for the California Department of Tax and Fee Administration (CDTFA) regarding county transit programs by clarifying that the sales and use tax exemptions for fuels such as diesel and compressed natural gas (CNG), that apply to public transit operators providing public transit services, also applies to counties that have operated their transit system and use these fuels to power their county-owned transit busses.

The Diesel Fuel Tax Law imposes taxes at a specified rate for the distribution or delivery of each gallon of diesel fuel, and establishes various exemptions from those taxes, including an exemption for an exempt bus operation that consists of, among other things, a transit district, transit authority, or city owning and operating a local transit system. Likewise, the Use Fuel Tax Law imposes a state excise tax at specified rates, generally $0.18 per gallon, on the use of fuel and establishes various exemptions from those taxes, including an exemption for any transit district, transit authority, or city owning and operating a local transit system. However, current law does not consider that several counties operate their own transit system that are not separate authorities or agencies but operated by a county department such as public works. Recently, the State has indicated that because the word "County" is not included in the language of the exemption, these counties that operate their own transit systems do not qualify for the exemption, although they are a public transit operator providing public transit services. This means that counties that operate their transit system are required to pay a tax that other public transit operators are not subject to while providing the same public services.

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

By adding the word "County" to Revenue and Taxation Code 60039 and 8655, SB 359 will ensure that county transit districts are treated fairly and are added to the list of entities that do not pay sales and use tax on fuels (diesel and CNG). This is extremely important as the State is experiencing a transit operations funding crisis, and the pandemic's impact on changing commute patterns and the loss of fare revenue remain huge challenges. Therefore, SB 359 will help counties that operate transit systems to continue delivering safe, frequent, and reliable transit service to the communities it serves.

For these reasons, the CSAC is proud to support SB 359 and respectfully requests your aye vote on this measure.
Sincerely,

Mark Neuburger
Legislative Advocate
CSAC

CC : Members, Assembly Revenue and Taxation Committee
The Office of the Honorable Roger Niello

June 17, 2025

The Honorable Marc Berman
Chair, Assembly Business & Professions Committee
1020 N St, Room 379
Sacramento, CA 95814

Re: Senate Bill 378 (Wiener): Banning Illicit Hemp Advertising – SUPPORT
As Amended May 29, 2025

Dear Chair Berman,

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and League of California Cities (Cal Cities), we write in support of Senate Bill 378 by Senator Scott Wiener, which will protect public health and safety and the legal cannabis market, against the threat of unlicensed cannabis businesses and intoxicating hemp products.

Specifically, this bill will allow consumers to seek civil penalties against online marketplaces that advertise illicit intoxicating hemp and cannabis products. Additionally, SB 378 helps prevent minors from accessing dangerous synthetic intoxicating hemp products by requiring a reporting mechanism on the online marketplace for consumers to report illicit advertisements, and a disclaimer to the consumer that the retailer has been known to sell illicit product.

Counties recognize the importance of cannabis industry regulation for the purposes of reinforcing consumer safety and economic development. By penalizing online platforms for neglecting or acting in violation of the law, this bill would disincentivize online illicit hemp marketplaces and advertising. This bill also would provide further transparency by requiring online platforms to disclose to the consumer if online cannabis marketplaces do not verify a California cannabis retailer license. This illicit advertising draws consumers away from licensed producers and retailers, putting retailers who follow the law at a disadvantage. Counties not only depend on the legal cannabis industry to stimulate economic growth, but also as a source of sales tax revenue to support regulations and enforcement.

SB 378 comes at a pivotal time where online platforms have made it easier for illicit cannabis operators to market and sell their products outside the scope of state tax systems and product safety regulations. Online platforms have failed to properly combat this ongoing problem due to a complex regulatory environment. Executives at weedmaps.com claim that since their company is not licensed by the Bureau of Cannabis

Control, they are not subject to bureau enforcement, and are refusing to stop running advertisements for unlicensed cannabis retailers.[1] Online platforms are citing Section 230 of the Communications Decency Act as a legal shield, mirroring arguments by Meta and X, formerly known as Twitter, against content regulation.

In the US in 2018, a tenth of young people who used drugs appear to have connected with dealers through the internet, with the large majority doing so through social media. Additionally, these digital dealers ran hundreds of paid advertisements on Meta platforms in 2024 to sell illegal opioids, and what appeared to be cocaine and ecstasy pills, according to a report by the Tech Transparency Projects[2], and federal prosecutors are investigating Meta over the issue.[3]

The widespread use of synthetic cannabinoids distorts consumer expectations regarding potency and safety. A white-paper produced by the San Diego/Imperial Counties Joint Labor Management Cannabis Committee, found that out of 104 hemp products from 68 brands, 95 percent contained synthetics despite their prohibition under California law. Under California's stricter "Total THC" definition, 88 percent failed to meet state hemp standards. Illegal hemp operators evade state regulations on safety, such as pesticide residue testing, batch tracking, and accurate product labeling. In other words, these marketplaces are not only harming legal cannabis business, but they are also poisoning consumers.[4]

All of these factors have created an uneven playing field for licensed and unionized cannabis businesses. The industry's legal operators are paying taxes, undergoing stringent testing, and following state regulations, while their illicit counterparts often do not. A staggering 91 percent of products analyzed were sold without collecting California's required sales taxes, and none of the vendors remitted the state's cannabis excise tax when legally obligated to do so.[5] This dynamic has led to a thriving shadow market where the risk of consuming unsafe products is high, and state and local governments are losing out on significant tax revenue.

SB 378 addresses these issues by enhancing consumer protections, requiring online platforms to establish a reporting mechanism on its site, and requiring a disclaimer

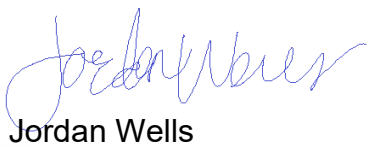
[1] Branan, Brad. "Weedmaps to Bureau of Cannabis Control: You Don't Have the Authority to Police Us." The Sacramento Bee, February 21, 2024. https://www.sacbee.com/news/california/california-weed/article204783469.html.
[2] Tech Transparency Project. "Meta Allows Drug Ads Selling Everything from Opioids to Cocaine." Tech Transparency Project. https://www.techtransparencyproject.org/articles/meta-allows-drug-ads-selling-everything-from-opioids-to-cocaine.
[3] Busby, Mattha. "Drug Dealers Have Moved." Wired, December 17, 2024. https://www.wired.com/story/drug-dealers-have-moved-onto-social-media/.
[4] Devitt, Tiffany, et al.. "The Great Hemp Hoax." February 12, 2025. https://www.hemphoax.com/.
[5] *Ibid*.

to the consumer for those online cannabis marketplaces that do not verify a California license.

It is for these reasons that RCRC, CSAC, and Cal Cities are proud to support SB 378 and urge your "aye" vote when this measure is heard before your committee. If you have any questions or would like to discuss further, please do not hesitate to contact us.

Sincerely,

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org



Jordan Wells
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CSAC
jwells@counties.org

Jolena Voorhis
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cc: The Honorable Scott Wiener, Member of the California State Senate
Members of the Assembly Business & Professions Committee
Robert Sumner, Chief Consultant, Assembly Business & Professions Committee
Bill Lewis, Consultant, Assembly Republican Caucus

June 16, 2025

The Honorable Ash Kalra
Chair, Assembly Committee on Judiciary
1020 N Street, Room 104
Sacramento, CA 95814

RE: SB 413 (Allen) - Juveniles: case file inspection.
As introduced on February 14, 2025 – SUPPORT
To be heard in the Assembly Judiciary Committee on June 24, 2025

Dear Chair Kalra,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC), we write in strong support of SB 413 (Allen), which will benefit both local agencies and plaintiffs with claims against local agencies by expediting access to relevant juvenile case records protected in the Welfare and Institutions Code (WIC). Critically, the bill would maintain confidentiality protections for the juvenile case records.

WIC § 827 allows certain parties to access juvenile records, including court personnel, the minor who is subject to the proceeding, and the minor's parents, or guardian, among others. Parties not included in WIC § 827 must file a petition with a juvenile court to obtain access to records, a process that can delay proceedings for more than a year.

Senate Bill 413 will improve existing procedures for resolving claims against local agencies for both plaintiffs and defendants by:

- Saving counties, as well child litigants suing counties, needed resources;

- Expediting civil claims against counties (for everything from claims of child sexual assault to dangerous conditions);
- Clarifying the statute to reduce inconsistencies among counties and courts; and,
- Ensuring that juvenile records are handled with care and confidentiality.

First, this bill clarifies that the use of the term "county counsel" in subparagraph (a)(1)(F) applies to the county counsel attorneys who represent the child welfare agency or probation department in any capacity. Second, this bill ensures that attorneys representing parties in a government tort claim or civil action, where a local agency, child welfare agency, probation department, or their employees acting in their official capacity, are named, are entitled parties for the purpose of accessing juvenile records.

This proposal would make meaningful progress in ensuring plaintiffs who are filing claims against a county, the child welfare department, or the probation department obtain timely resolution of their claims. In addition to saving time, this proposal will reduce litigation costs by eliminating the now necessary, time-consuming, and costly WIC § 827 petition process. And, importantly, it protects the confidentiality rights of minors by including very specific requirements for the care, handling, and ultimate destruction of the juvenile records.

SB 413 strikes the appropriate balance between the Code's presumption that juvenile records are unavailable to the public except under specified circumstances, and the need for county counsel and attorneys representing counties to access the files when counties are sued for damages by current or former wards and dependents.

For these reasons, CSAC is proud to support SB 413 (Allen). Should you have any questions regarding our position, please do not hesitate to contact Eric Lawyer (elawyer@counties.org), Jean Hurst (jkh@hbeadvocacy.com), or Sarah Dukett (sdukett@rcrcnet.org).

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Hurst
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

CC: The Honorable Ben Allen, California State Senate
Members and Staff, Assembly Committee on Judiciary
Alison Merrilees, Chief Counsel, Assembly Committee on Judiciary
Daryl Thomas, Consultant, Assembly Republican Caucus

June 18, 2025

The Honorable Liz Ortega
Chair, Assembly Labor and Employment Committee
1020 N Street, Room 155
Sacramento, CA 95814

Re: **SB 464 (Smallwood-Cuevas) Employer pay data**
As amended May 1, 2025 – OPPOSE UNLESS AMENDED
To be heard in the Assembly Labor and Employment Committee on June 25, 2025

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), League of California Cities (Cal Cities), California Special Districts Association (CSDA), Urban Counties of California (UCC) and Rural County Representatives of California (RCRC), we respectfully oppose SB 464 (Smallwood-Cuevas), unless amended.

According to the author, the amendments to Section 2 published on May 1 were intended to "limit the scope of the bill to state workers." We understand these amendments were made to respond to the concerns of our coalition. However, the current bill language could require a portion of counties, and a portion of their workforce, to conduct the annual pay data report. This means the bill would impose a new reporting requirement on 25 of the state's smallest, most rural counties; most of which lack the resources of the larger counties that would be excluded from the bill's requirements.

The May 1 amendments narrow the definition of a "public employer," to "...the employer of an employee in the state 'civil service,' as that phrase is defined in Article VII of the Constitution." While Article VII does not, in fact, define "civil service," the term is often used to refer to not only the state workforce, but also segments of the local workforce whose positions are funded in part by the federal government for social services and child welfare programs, a system known as the Merit System Services Program (MSS). Those positions are subject to State personnel standards administered by CalHR[1] and 25 counties are required to have their MSS program administered by CalHR. The language in SB 464 is unclear as to

[1] Government Code §§ 19800-19811

whether or not the bill applies to MSS employees and could be interpreted to require reporting by counties for those employees.

We believe this is an unfair treatment for rural counties and is not aligned with the intent of the author. Further, if counties are required to submit the report for MSS employees, it could muddy the data, as pay data for state employees will be mixed with data from a few segments of the county workforces among just under half of California's counties.

To address these concerns, we have asked the author to accept the following amendments to Section 12999.1(c):

> (1) "Employee" means a person employed in the "state civil service" as that phrase is defined in Article VII of the Constitution. *For the purposes of this section, "public employer" does not include a "local agency," as defined in Government Code Section 3511.1(c).*
>
> (2) "Public employer" means the employer of an employee in the state "civil service," as the phrase is defined in Article VII of the Constitution. *For the purposes of this section, "public employer" does not include a "local agency," as defined in Government Code Section 3511.1(c).*

With the amendments we have provided, the bill would meet its intended purpose, avoid data challenges, and would no longer be a reimbursable state mandated program. However, we must remain respectfully opposed to the bill unless it is amended to apply solely to state agencies and their workforce.

Sincerely,

Eric Lawyer
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Johnnie Pina
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Aaron Avery

Sarah Dukett
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Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
jkh@hbeadvocacy.com

CC: The Honorable Lola Smallwood-Cuevas, California State Senate
Members and Consultants, Assembly Labor and Employment Committee
Megan Lane, Chief Consultant, Assembly Labor and Employment Committee
Lauren Prichard, Consultant, Assembly Republican Caucus

June 16, 2025

The Honorable Damon Connolly
Chair, Assembly Environmental Safety and
Toxic Materials Committee
1020 N St, Room 171
Sacramento, CA 95814

RE: Senate Bill 561 (Blakespear) – SUPPORT
As Amended April 7, 2025

Dear Chair Connolly:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and the League of California Cities (Cal Cities), we are pleased to support Senate Bill 561 (Blakespear), which creates a producer responsibility program for end-of-life management of emergency distress flares.

Senate Bill 561 requires manufacturers to create, fund, and implement a producer responsibility program for the end-of-life management of expired emergency distress flares. Flares are important safety and emergency devices. The U.S. Coast Guard requires visual distress signals be carried on recreational boats and many opt for marine flares to meet this requirement. While flares are vital safety devices, they generally have expiration dates of less than four years and must be managed as explosive hazardous wastes. While flares can cost consumers from $13-$26 each, they generally cost local governments $46 or more per flare for disposal.

Local governments are responsible for the collection, processing, recycling and disposal of solid waste, including the operation of local household hazardous waste collection programs. These local programs provide important public services and prevent improper disposal of hazardous wastes. Our local programs often offer residents free drop off of HHW; however, the costs to manage some of the waste streams are shocking and put serious financial pressure on the programs and local governments that operate them. Many products, including flares, are far more expensive to manage at the end-of-life than it cost consumers to purchase the product at the point-of-sale. Rather than forcing local governments (and taxpayers) to shoulder those costs, SB 561 appropriately requires the manufacturers who introduce those goods into the stream of commerce to take charge of the collection, transportation, and management of their expired flares. We believe that SB 561 will create clearer and more

convenient disposal opportunities for consumers to safety dispose of expired emergency distress flares.

We support SB 561 (Blakespear) because it will increase convenience for consumer disposal of flares while reducing costs for local household hazardous waste programs. For these reasons, we respectfully request your "aye" vote when this measure is heard before your committee.

If you should have any questions, please do not hesitate to contact John Kennedy (RCRC) at jkennedy@rcrcnet.org, Jordan Wells (CSAC) at jwells@counties.org, or Melissa Sparks-Kranz (Cal Cities) at msparkskranz@calcities.org.

Sincerely,

JOHN KENNEDY	JORDAN WELLS	MELISSA SPARKS-KRANZ
RCRC	CSAC	Cal Cities
Senior Policy Advocate	Legislative Advocate	Legislative Representative

cc: The Honorable Catherine Blakespear, Member of the California State Senate
Members of the Assembly Environmental Safety and Toxic Materials Committee
Josh Tooker, Chief Consultant, Assembly Environmental Safety and Toxic Materials Committee
Gino Folchi, Consultant, Assembly Republican Caucus

June 16, 2025

Honorable Juan Carrillo
Chair, Assembly Committee on Local Government
1020 N Street, Room 157
Sacramento, CA 95814

RE: **SB 753 (Cortese) Abandoned Shopping Cart Recovery**
Notice of SUPPORT *(As Amended 03/24/25)*

Dear Assembly Member Carrillo,

The League of California Cities and the California State Association of Counties are pleased to support your **SB 753 (Cortese)**, which would provide additional tools to local governments to address abandoned shopping carts in communities.

Abandoned shopping carts have created hazards by blocking streets and sidewalks and disrupting open spaces and waterways. SB 753 would modernize the laws requiring the collection of abandoned shopping carts and provide local governments and retailers with better tools to address this issue.

Under current law, local governments must store abandoned shopping carts in an impound lot, where they sit until a retailer retrieves them. This process has inherent challenges, especially for large municipalities, which would need to store hundreds of abandoned shopping carts at any given time to comply with this provision. The storage space and staff cost required to operate an impound lot is a burdensome and ineffective solution to this issue.

SB 753 would allow local governments to return carts directly to retailers by picking them up and immediately returning them without the current requirement for three-day notice or storage in an impound facility. Additionally, this measure would allow for the recovery of the actual costs of managing the program. This strikes the appropriate balance of creating an efficient system to retrieve and return abandoned shopping carts while incentivizing retailers to work collaboratively with local governments to recover their stolen property.

For these reasons, Cal Cities and CSAC are pleased to support your SB 753 (Cortese). If you have any questions, please feel free to contact us at cgrinder@calcities.org and jwells@counties.org.

Sincerely,

Caroline Grinder
Legislative Advocate
League of California Cities

Jordan Wells
Legislative Advocate
California State Association of Counties

June 19, 2025

The Honorable Gavin Newsom
California State Governor
1021 O Street, Suite 9000
Sacramento, CA 95814

The Honorable Mike McGuire
Senate President pro Tempore
1021 O Street, Suite 8518
Sacramento, CA 95814

The Honorable Robert Rivas
Speaker of the State Assembly
1021 O Street, Suite 8330
Sacramento, CA 95814

The Honorable Scott Wiener, Chair
Senate Committee on Budget & Fiscal Review
1020 N Street, Room 502
Sacramento, CA 95814

The Honorable Jesse Gabriel, Chair
Assembly Committee on Budget
1021 O Street, Suite 8230
Sacramento, CA 95814

RE: CWDA-Proposed CalWORKs Trailer Bill Language (TBL) – SUPPORT

Dear Governor Newsom, President Pro Tempore McGuire, Speaker Rivas, Chair Wiener, and Chair Gabriel:

The undersigned organizations support the CalWORKs TBL proposed by the County Welfare Directors Association (CWDA) to address persistent underfunding of county administration of the CalWORKs program. We respectfully urge the Administration and Legislature to adopt the TBL as a step towards strengthening the program's ability to deliver better outcomes for families across California.

The CalWORKs program is a cornerstone of California's safety net, providing critical assistance and employment services to low-income families. However, as acknowledged by the California Department of Social Services (CDSS) and reflected in county experience, the Single Allocation that funds program administration has not kept pace with actual operational costs needed to deliver services. Counties are managing growing workloads, frequent policy changes, and increasingly complex client needs with insufficient resources. This reality leads to conditions that undermine the program's ability to meet state and federal mandates, and more importantly, to support CalWORKs families in achieving lasting economic stability. For counties, this underfunding results in high turnover and burnout among frontline workers. For families, it can mean prolonged periods of insecurity, and increased stress that affects the entire household.

The proposed TBL requiring CDSS to consult with CWDA, legislative staff, organized labor, and community advocates provides a meaningful and timely forum to address these long-standing challenges. The proposed language will enable a comprehensive assessment of gaps, workload pressures, missed opportunities for employment services, and barriers to program access. We

strongly support the language's requirement that this effort yield actionable recommendations, including the improved alignment of program expectations with available funding, and the identification of streamlining opportunities that center participant success.

By centering the voices of county administrators, frontline workers, and the families served by CalWORKs, this effort lays the groundwork for sustainable improvements. Transparent reporting, fiscal analysis, and the potential for both temporary and permanent reforms will help ensure that CalWORKs continues to fulfill its mission as an effective anti-poverty program.

We urge the Legislature and Administration to retain and fully implement the proposed TBL in the final 2025-26 Budget package.

Sincerely,

Carlos Marquez III
Executive Director
County Welfare Directors Association

Justin Garrett
Senior Legislative Advocate
California State Association of Counties

Tiffany Whiten
Senior Governmental Relations Advocate
California State Council of SEIU

Rebecca Gonzales
Policy Advocate
Western Center on Law and Poverty

Andrew Cheyne
Managing Director of Public Policy
GRACE

Kevin Aslanian
Executive Director
Coalition of California Welfare Rights Organizations, Inc.

June 18, 2025

The Honorable Gavin Newsom
California State Governor
1021 O Street, Suite 9000
Sacramento, CA 95814

The Honorable Mike McGuire
Senate President pro Tempore
1021 O Street, Suite 8518
Sacramento, CA 95814

The Honorable Robert Rivas
Speaker of the State Assembly
1021 O Street, Suite 8330
Sacramento, CA 95814

The Honorable Scott Wiener, Chair
Senate Committee on Budget & Fiscal Review
1020 N Street, Room 502
Sacramento, CA 95814

The Honorable Jesse Gabriel, Chair
Assembly Committee on Budget
1021 O Street, Suite 8230
Sacramento, CA 95814

RE: CWDA Proposed In-Home Supportive Services (IHSS) County Trailer Bill Language (TBL) – SUPPORT

Dear Governor Newsom, President Pro Tempore McGuire, Speaker Rivas, Chair Wiener, and Chair Gabriel:

The undersigned organizations support the IHSS County TBL proposed by the County Welfare Directors Association (CWDA) to address persistent underfunding of county administration of the IHSS program, exacerbated by proposed Community First Choice Option (CFCO) penalties being passed to counties. We respectfully urge the Administration and Legislature to adopt the TBL as a step toward reducing high social worker caseloads in the IHSS Program to help safeguard timely access to services for IHSS recipients.

County social workers and staff are relied upon to process applications timely, conduct initial home visits to assess for needed support of activities of daily living, perform annual reassessments to update client service hours, and enroll and ensure payment to the IHSS consumer's preferred provider. Insufficient funding for county administrative work has a direct and negative impact on IHSS consumers and their care providers. It also contributes to high caseloads and staff turnover, with compounding effects that make it difficult for counties to meet their statutory requirements. Ultimately, this harms IHSS consumers and jeopardizes the ability of older adults and persons with disabilities to live safely in their homes and communities.

CDSS Reassessment of IHSS Administrative Funding Methodology Confirms Counties are Underfunded, but Likely Understates the True Gap: The Administration's own reassessment of the IHSS budget methodology, as required by the 2024 Budget Act, confirmed the severe underfunding counties have long experienced. The IHSS reassessment conducted by the California Department of Social Services (CDSS) identified an underfunding by at least $246.1

million total funds ($124.8 million General Fund) for IHSS administration. However, no funding was included in the May Revision to address this gap. While the study confirmed counties' experience of chronic underfunding in the program over the last eight years, the Administration's study methodology is flawed, according to CWDA, because the Administration made erroneous assumptions of social worker costs and hours worked. The reassessment also left key factors unaddressed, including the workload for denied applications. As a result, according to CWDA, the true cost of administering IHSS is likely much higher than $246 million total funds.

Adding Community First Choice Option (CFCO) penalties could result in up to an additional $81 million loss in administrative funding beginning in FY 2025-26 (based on the May Revision) and potentially growing in cost to counties on an annual basis. While we appreciate that the Legislature's budget takes a reasonable, phased-in approach to applying penalties, the penalties will inevitably exacerbate an already unsustainable workload for county social workers and endanger access to services for older adults and people with disabilities.

The systemic underfunding has real human consequences. Consumers face delays in accessing IHSS services due to reassessment backlogs and intake bottlenecks. In some counties, social worker caseloads exceed 500 to 600 cases per worker, threatening service quality and jeopardizing consumer safety, housing stability, and independence. Further, the proposed CFCO penalties would force counties to make difficult tradeoffs: for example, prioritizing reassessments over intakes could leave new applicants waiting in hospitals or other settings for critical in-home services, or aging IHSS consumers not on CFCO could be left waiting over a year for their reassessment to address increasing needs for services. This undermines the goals of California's Master Plan for Aging and places recipients at increased risk of institutionalization and homelessness.

In light of these challenges, we strongly support the proposed IHSS TBL which would:

- **Mandate CDSS to use actual county claims data**, when reassessing the cost of social work staffing in the IHSS program every three years;
- **Establish a stakeholder workgroup with county representatives, consumer representatives, labor organizations that represent county workers, and other relevant stakeholders to examine the impact of underfunding** and identify possible workload relief options;
- **Require CDSS to develop a billing mechanism with CWDA** to charge actual CFCO penalties incurred, rather than applying across-the-board administrative reductions;
- **Hold county administration funds harmless** from any further 2025 Budget Act solutions beyond the CFCO proposal, allowing counties to retain funding for core social work activities such as processing applications and meeting timely reassessments.

The TBL sets the stage for transparent discussions of the future of IHSS program support and needs to meet California's growing older adult population.

The undersigned organizations urge the Legislature and Administration to support the CWDA IHSS TBL to strengthen IHSS administration and protect the vulnerable Californians who rely on these essential services.

Sincerely,

Carlos Marquez III
Executive Director
County Welfare Directors Association

Justin Garrett
Senior Legislative Advocate
California State Association of Counties

Tiffany Whiten
Senior Governmental Relations Advocate
California State Council of SEIU

Kim Levy Rothschild
Executive Director
California Association of Public Authorities for IHSS (CAPA)

Kelly Brooks-Lindsey
Legislative Advocate
Urban Counties of California

Sarah Dukett
Policy Advocate
Rural County Representatives of California

Kate Laddish
President
California IHSS Consumer Alliance

Janie Whiteford
Interim Executive Director
California IHSS Consumer Alliance

August 7, 2025

The Honorable Anna Caballero
Chair, Senate Committee on Appropriations
State Capitol, Room 412
Sacramento, CA 95814

Re: **AB 1331 (Elhawary): Workplace surveillance**
As amended 7/17/2025 – OPPOSE
To be heard in Senate Committee on Appropriations August 18, 2025

Dear Chair Caballero,

On behalf of the California State Association of Counties (CSAC); Urban Counties of California (UCC); Rural County Representatives of California (RCRC); Public Risk Innovation, Solutions, and Management (PRISM); California Special Districts Association (CSDA); Association of California School Administrators (ACSA); League of California Cities (Cal Cities); California School Boards Association (CSBA); the California Association of Recreation and Park Districts (CARPD); California Association of School Business Officials (CASBO); California Municipal Utilities Association (CMUA); and the Northern California Power Agency (NCPA); we write in respectful opposition to AB 1331 (Elhawary), which would impose significant costs on the public agencies and schools, heighten risk of abuse of vulnerable populations served by our agencies, endanger our ability to perform essential public services, impede our ability to manage and respond to workplace violence threats, and make public agencies and schools more vulnerable to waste, fraud, and abuse of public resources.

Our coalition insists that this bill is wrongly applied to local governments and should be **amended to fully exempt local agencies and schools**. The bill imposes unnecessary security risks for public agencies, schools, and those we serve. The right of public employees to organize is well protected from the types of behavior this bill intends to address. Our coalition would remove opposition if local agencies were removed from the bill.

Imposes significant fiscal pressures on the state, local agencies, and schools
AB 1331 would impose a variety of new cost pressures on all levels of government in California through direct and indirect costs. The bill would impose immediate direct costs for public agencies and schools, requiring them to conduct audits across departments to review existing security tools for compliance and, in some cases, require them to disable or move existing tools.

Compliance would require significant work and collaboration across local agency departments, including IT professionals, county counsel, and respective department heads and subject matter experts. Some devices would need to be deactivated, or have data segmented or excluded. Systems would need to be adjusted, which could be complicated, expensive, and interfere with existing contracts. New signage would need to be created and posted. In some cases, this would have to be accomplished on leased facilities, requiring coordination with lessors and potentially adding to leasing or insurance costs. The bill applies to all public agencies and schools. Counties alone may own or lease hundreds of sites. The costs are difficult to estimate, but are likely to be substantial. All of this would need to be completed in fewer than three months, or else significant fines could be imposed for violations of the new law.

Public agencies and schools are required to maintain a variety of internal policies and procedures, including safety and workplace violence prevention plans Often, the use of surveillance tools is bargainable and detailed in side letter agreements. AB 1331 would compel state agencies and the thousands of local agencies and schools to meet and confer to review and update their bargaining agreements, policies, and procedures – a significant administrative effort that must accomplished before January 1, 2026.

The bill could impose a disruptive burden on the courts and law enforcement, as it would interject both into what has traditionally been the right of an employer: to view surveillance footage in response to safety concerns. We question whether this is an appropriate use of either resource.

At its core, AB 1331 would restrict tools used to protect the public and our workforce, subjecting public agencies and schools to heightened legal liability. At a time when nuclear lawsuits are straining local budgets, AB 1331 would restrict tools needed to keep workplaces safe. While the bill has been amended to limit its application to “employee only,” areas, the risk of abuse remains, as bad actors would be well aware of locations in a public facility where surveillance tools are limited and could bring vulnerable members of the public into those areas. In total, this will make it harder to protect those who are vulnerable to abuse, add to public liability, and increase insurance premium costs.

Finally, AB 1331 would allow public agencies and schools fewer than three months to comply with these expensive and sweeping requirements, causing our workforces and

budgets to be redirected to respond to the sudden compliance deadline. This unfunded mandate will unnecessarily drain public resources at a time of unprecedented budget uncertainty.

Needlessly endangers public employees and those they serve

Even with the proposed amendments, AB 1331 would interfere with the ability of local agencies to protect foster children, keep kids safe in schools, and maintain the safety of their workforce or the communities they serve—including election facilities, libraries, and shelters for the unhoused. The bill allows for the use of surveillance tools if "required by state and federal law or regulations". While this amendment may allow *some* facilities to continue to use necessary security tools, it is unclear the extent to which this amendment will allow public agencies to protect critical infrastructure and government facilities. Put simply, state and federal laws are rarely prescriptive about the use of security tools – the need for security is implicit. Further, this attempt to exclude certain locations, including airports, from the law's provisions is a clear acknowledgement that AB 1331 creates security gaps for critical facilities.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life and appreciate that one could imagine that appropriate limits are needed to prevent employers from snooping into the private lives of their employees. However, the scope of this bill is vast and would deem basic security tools used for everyday work, including security cameras, collaboration tools like Teams or Slack, or GPS tools used to track fleets, to be "surveillance tools" whose use would be constricted. Under AB 1331, any device that collects or facilitates collection of data of an employee's movements, actions, communications, or behaviors, is deemed a surveillance tool that cannot be used when employees are off duty or in "employee only" areas.

AB 1331 will needlessly endanger public workforces and severely impair our ability to prevent and investigate instances of workplace violence. The bill restricts the ability for public agencies to review data collected through a surveillance tool in any "off-duty area," defined to include breakrooms and cafeterias unless directed by a court order or upon request by either a court, law enforcement, or by an employee. These restrictions needlessly inhibit the use of tools that can be used to keep employees safe from workplace violence incidents or, worse, provide the worst actors with a roadmap of locations where they can more easily hide bad behavior, including abuse of vulnerable populations like children, the elderly, or those experiencing mental health crises.

Unfortunately, we have seen rising hostility and threats against government entities and their workforces. That includes violence and threats of violence against government employees whose job requires them to serve the public, like library staff, teachers, firefighters, benefits officers, among myriad other examples. It also includes public officials who are frequently targeted with threats or actual violence, including election workers,

health officers, and public officials. AB 1331 would heighten vulnerability for public servants at a time of strong anti-government sentiment.

Ability to "leave behind," wearable devices
Under AB 1331, employees must be allowed to leave behind surveillance tools during off-duty hours or when they are entering off-duty areas. It's unclear how these rules would apply to a variety of tools that public employees may be required to use, including ID badges, body cameras for law enforcement, or tools used for public vehicle fleets, including dash cameras, speed monitors, or GPS tracking.

Consider election workers, who could be allowed to leave behind tracking tools used to track the delivery and pickup of ballots. Or, teachers, who in some districts are required to wear alerts at all times to provide immediate notice of a student safety concern, including an active shooter, student-on-student violence, or another emergency. The ability for an employee to claim they had simply been in a rest period will give those who are rightfully required to wear surveillance tools an easy out for any behavior that conflicts with laws or agreements that require wearable tools for public and employee safety. Further, some school and public agency policies require that employees wear these tools at all times. AB 1331 would undermine those local policies by allowing for device removal in some locations and during breaks.

Amendments raise new privacy and cost concerns
The ability for employees to request video footage also raises critical privacy concerns about the disclosure of those in the footage, placing public agencies in the difficult position of potentially violating an employee's privacy or incurring considerable costs to blur or pixelate the images of those in the footage.

Significantly expands government liability
To compound all our concerns, AB 1331 imposes severe financial penalties for non-compliance: $500 for every employee of an agency. For many local agencies and schools, a single penalty could reach into the millions of dollars. For public agencies, these penalties can be staggering and severely impact funds needed to provide essential public services.

At a time of significant budget constraints at the state and local level, now is not the time to subject public agencies to nuclear fines for providing basic security measures, particularly when so many aspects of this law are vague and ripe for misinterpretation.

Inappropriately applies to public agencies
We understand the sponsors are advancing this bill to address activities by private employers that use security tools to undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union activities. For example, Government Code § 3550

provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Public agencies and schools do not have a profit motive. The surveillance tools defined by this bill are not used for productivity monitoring in the name of achieving profits. Instead, they are used to protect the public we serve and prevent against waste, fraud, and abuse of public resources.

Put simply, public agencies use the "surveillance tools" defined in this law to protect public resources, employees, and the public – not to influence employee organization activities. We once again urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1331 and urge your "NO" vote.

Sincerely,

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CC: The Honorable Sade Elhawary, Member, California State Assembly
Members, Senate Committee on Appropriations
Robert Ingenito, Consultant, Senate Committee on Appropriations
Kirk Feely, Fiscal Director, Senate Republican Caucus

June 27, 2025

The Honorable Thomas Umberg
Chair, Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

Re: **AB 1337 (Ward): Information Practices Act of 1977**
As amended May 23, 2025 – OPPOSE
To be heard in the Senate Judiciary Committee July 15, 2025

Dear Chair Umberg,

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), California Special Districts Association (CSDA), the Association of California Healthcare Districts (ACHD), California Welfare Directors Association (CWDA), California Association of Public Hospitals (CAPH), California Association of Joint Powers Authorities (CAJPA), the County Health Executives Association of California (CHEAC), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Municipal Clerks Association (CMCA), the District Hospital Leadership Forum (DHLF), the California Hospitals Association (CHA), and the California Association of Recreation and Park Districts (CARPD), we write to respectfully oppose AB 1337 (Ward), which would amend the Information Practices Act of 1977 ("IPA," or "the Act") and apply it to all 58 counties, 483 cities, over 1,000 school districts and county offices of education, approximately 2,200 independent special districts, and the hundreds of JPAs, regional bodies, and other public agencies.

AB 1337 would raise significant questions for how state and local agencies can continue to operate critical safety net programs and impose severe restrictions on data sharing in ways that undermine integrated service approaches that support timely and efficient access to essential benefits. AB 1337 ignores the myriad of privacy and confidentiality laws already in place for local governments and, instead, imposes a clumsy set of provisions that create conflicts with longstanding confidentiality laws, complicate data reporting needed for accountability efforts, and endanger federal funding, among other risks. This is a costly, unnecessary change that could jeopardize essential services and harm the communities we serve: students, the unhoused, the elderly, and those on the economic margins who rely on public services for healthcare, housing, energy, and the services that comprise the social safety net.

While AB 1337 has many provisions, it would impose three new overlapping standards for how local agencies manage public data:

- *Use* of data is constrained to only the purpose for which it was collected, except as authorized or required by state law [Civil Code § 1798.20(b)];
- *Transfer* of data, including between state and local agencies, must be necessary both to perform constitutional and statutory duties and must "further the purpose" for which the data were collected [Civil Code § 1798.24(e)]; and
- *Disclosure* of data, including reporting of aggregated data, is prohibited if it could, instead of the current standard that it would, identify an individual to whom it pertains [Civil Code § 1798.24].

Complicates Data Sharing and Reporting

Local governments and the state have made considerable progress in providing wraparound services to those most in need by improving connectivity of resources. This progress has been made under the "no wrong door" approach. AB 1337 would undermine this hard-earned progress.

The proposed amendments to Civil Code § 1798.24(d) & (e) would prohibit government agencies from sharing data with other government agencies unless it "furthers the purpose," for which the data were collected. This vague definition creates more questions than answers compared to the current standard that the data are shared in a way that "is related to," or "compatible with" the purpose for which the information was acquired.

AB 1337 will make benefit applications more time consuming and less efficient by requiring repeated collection of information, representing a step backwards at a time when local agencies are trying to make the public benefit application process more efficient.

AB 1337 would complicate the efforts of the CalAIM Justice-Involved initiative, which relies on information sharing to ensure that the justice-involved community is connected to healthcare services as they re-enter the community. These same concerns apply to local reentry resource centers, which provide a range of services to help justice-involved individuals reestablish themselves in the community.

By requiring individuals to opt into data sharing, reporting will be biased towards those who choose to opt into sharing their data – creating unknown impacts that will make it harder to discern which populations are underrepresented in service delivery. Civil Code § 1798.24 would prohibit agencies from disclosing any data that *could* identify an individual, which could have a chilling effect on reporting outcomes of public services. Public employees could reasonably choose not to publish reports that, while designed to account for service delivery across demographic and economic strata, could place them at risk of a misdemeanor. We are concerned this could impact the vulnerable populations who rely most on public services.

Hampers Abilities to Respond to Unlawful Activity

The proposed law would severely restrict the ability of a public agency to respond to a criminal act. The proposed amendments to Civil Code § 1798.24(l) & (o) would remove longstanding exceptions to the act that allow disclosures in response to a search warrant or to aid an investigation into unlawful activity.

This change would put agencies in an absurd position when they have knowledge about a member of the public implicated in a crime. If this law were to take effect, agencies would have to obtain permission from an accused individual before they could share identifying information needed to aid an investigation or fulfill a search warrant. Further, local agency employees could be accused of obstruction charges or other penalties from noncompliance in response to search warrants.

For agencies responsible for child and family services, this change could restrict information sharing with law enforcement in ways that could endanger child safety and make it harder for those agencies to evaluate risk and safety. Social workers could be held liable with a misdemeanor or termination for attempting to ensure child safety – an outcome that is clearly not the intent of this bill, but an example of

the unintended consequences created when bills are drafted without the input of impacted local agencies.

Expands Legal Liability for Public Agencies and their Workforce

In addition to applying the IPA to local agencies, the bill would revise the law in several ways that will expose agencies and their workforce to new legal liabilities, including through a private right of action. The bill would amend Civil Code § 1798.24 to prohibit disclosure of any personal information that "could," link the information to an individual, rather than the current standard that prohibits disclosure of information that "would," link to an individual. This change alone will dramatically redefine the IPA in ways that will impose uncertainty on how agencies can share data needed to report outcomes or comply with state and federal grant requirements.

AB 1337 adds to these concerns by expanding liability for public employees. The proposed change to Civil Code § 1798.55 would expose public employees to discipline, including termination, for "negligent" violations of the act, a broad expansion of the current standard for "intentional," violations. Additionally, the proposed change to Civil Code § 1798.57 would expose public employees to misdemeanors even if there is no economic loss or personal injury due to a disclosure. At a time when public agencies are facing workforce recruitment and retention challenges, now is not the time to expose public employees to legal liabilities arising from compliance with a law that is suddenly imposed upon them. In addition to harming the public workforce, this will add to local agency liability as they will be required to respond to legal claims for penalized employees.

Ignores and Conflicts with Existing Privacy and Confidentiality Laws

Local agencies and schools are already required to comply with a variety of state and federal data privacy laws tailored to conform with specific programs administered by counties, including the following examples.

Health

- The Health Insurance Portability and Accountability Act (HIPAA) and the Confidentiality of Medical Information Act (CMIA) regarding Medi-Cal beneficiaries and those receiving care at public hospitals;
- 42 CFR Part 2 for confidentiality of substance use disorder patient records;
- Welfare and Institutions Code (WIC) § 5325.1 regarding the right to privacy for persons receiving treatment for a mental illness;
- WIC § 827 regarding the right to privacy for juvenile records; and

- Penal Code § 13823.5(c)(2) regarding confidentiality of sexual assault examination records.

Social Services

- WIC § 10850 *et seq.* regarding confidentiality of applications and records related to public social services;
- WIC § 17006 regarding confidentiality of county general assistance records;
- WIC § 17006.5 regarding disclosure of county general assistance records to law enforcement;
- WIC § 14100.2 regarding confidentiality and management of Medi-Cal records; and
- Penal Code § 11675 for case records related to child protective services claims.

Elections

- Elections Code §§ 2166, 2166.5, and 2166.7 regarding requests for confidentiality of voter records;
- Elections Code § 2194 regarding confidentiality of an affidavit of voter registration and limitations on its use; and
- Elections Code § 17100(c) regarding limitations on public access to nomination documents and petitions.

Schools

- Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g) regarding students' privacy.

Criminal Justice

- Penal Code § 11100 *et seq.* regarding custody of criminal records and statistics;
- Penal Code § 11164 *et seq.* regarding confidentiality of child abuse and neglect reports; and
- Penal Code § 13100 *et seq.* regarding records and data for criminal offenders.

Finance

- Revenue and Taxation Code §§ 63.1(i) and 69.5(n) regarding confidentiality of property transfer records; and
- Revenue and Taxation Code §§ 408, 408.1, 408.2, 451, 481, and 1609.6 regarding the confidentiality and disclosure rules related to assessor duties.

Public Utilities

- Public Utilities Code § 8381 for customers of publicly-owned utilities.

Libraries

- Gov. Code § 7927.105 for confidentiality of registration and circulation records of library users; and
- Welfare and Institutions Code §§ 10850 and 14100.2 for confidentiality of records and data sharing of personal identifying information.

In addition to state and federal law, several counties have adopted ordinances and established departments focused on data privacy and confidentiality.

Put simply, local agencies take data privacy and confidentiality seriously and comply with a network of specific privacy and confidentiality laws. AB 1337 upends this longstanding framework with a blanket policy that conflicts with some existing laws or creates confusion and inconsistent compliance based on how agencies are used to compliance. While the California Consumer Privacy Act expressly provides that its requirements do not apply to information governed by CMIA, AB 1337 makes no attempt to square its broad requirements with the litany of existing privacy laws that apply to local programs.

For example, under HIPAA, de-identified individual data cannot be disclosed without authorization. However, population-level data are generally available to the public for statistical research if the data cannot reasonably ascertain an individual's identity. HIPAA provides significant detail as to how disclosures and covered entities are required to provide an accounting of disclosures to individuals. AB 1337 imposes a new overlapping standard that any data disclosed "cannot identify any individual," creating a confusing standard that competes with longstanding principles.

To cite another conflict, HIPAA allows covered entities to disclose protected health information without an individual's consent for purposes including treatment, payment, or health care operations[1]. AB 1337 ignores these carefully designed rules and imposes significant uncertainty as to how patient data can be shared for delivery of medical care by public hospital systems.

County child welfare and behavioral services laws restrict even acknowledging whether an individual is receiving care, unless an entity is specifically authorized by

[1] 5 C.F.R. § 164.502(a)(1)

law[2]. AB 1337 would establish contrary rules that endanger child privacy by allowing for the release of information upon consent and by other circumstances established in Civil Code § 1798.24.

Endangers Federal Funding

AB 1337 would prohibit data sharing with the federal government unless expressly authorized by state law. This change alone could threaten federal funding agreements and create preemption issues that local governments would be forced to navigate. By restricting data sharing with the federal government, vital funding for homelessness services, public health grant programs, victim witness programs, and task forces to combat human trafficking would be threatened.

Imposes Expensive Requirements on Local Agencies, with No Time or Resources

The bill in its current form does not appear to contemplate the vast technical effort that would be required for thousands of state and local agencies to come into compliance. The effort would certainly require technological changes, including in many cases new equipment, coding for proprietary systems, and software purchases—in addition to legal analysis and training efforts.

The Act was not designed with local agencies in mind and is peppered with requirements that do not make sense in that context. Application of the IPA to local agencies would not only require time and staff capacity, it would also require significant financial resources that are not provided in the bill. AB 1337 clearly imposes a state mandate by requiring a new program for data management. State mandates require reimbursement to local agencies and, in this case, could total many millions of dollars just for the initial implementation, not including the ongoing support needed to sustain compliance. Application of the IPA to local agencies must be accompanied by sustainable and sufficient resources.

Section 17 of the bill asserts that no reimbursement is required by the act, suggesting that the only state-mandated activity directed by the bill is due to the adjustments to a crime or infraction. We believe the language is inappropriate and should be amended to clearly declare that the bill would establish a new mandate reimbursable under state law, as the bill clearly mandates a new activity by local agencies: compliance with the IPA, which requires significant changes to software, internal practices, and duties of local agency workforces.

[2] California Welfare & Institutions Code § 827 et seq. (child welfare); 42 C.F.R. Part 2 (behavioral health); Lanterman-Petris-Short Act (behavioral health).

To add to these challenges, the bill allows state and local agencies little time to prepare for compliance. Because the bill would take effect January 1, 2026, and because state and local agencies may not know if the bill will become law until the Governor's October 12, 2025, deadline to sign or veto bills, state and local agencies could have fewer than three months to prepare for compliance with the IPA. Agencies would be left with just a few months to complete legal review, train staff, update forms, and implement new procedures for data management.

For the reasons above, we must respectfully oppose AB 1337 and urge your "no" vote.

Sincerely,

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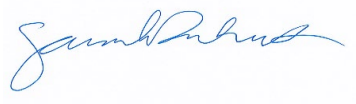

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California Association of Recreation and Park Districts
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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Senate Judiciary Committee

June 27, 2025

The Honorable Angelique Ashby
Chair, Senate Committee on Business, Professions and Economic Development
1021 O Street, Room 3320
Sacramento, CA 95814

RE: AB 8 (Aguiar-Curry) Cannabis: cannabinoids: industrial hemp
As amended on May 23, 2025 – SUPPORT
To be heard in Senate Business, Professions and Economic Development Committee

Dear Chair Ashby,

On behalf of the California State Association of Counties (CSAC), the Rural County Representatives of California (RCRC), and the League of California Cities (Cal Cities), we write in **support** of AB 8 (Aguiar-Curry), which would make important changes to regulate intoxicating hemp to protect the health and safety of our communities and prevent these untested, untaxed, and unregulated products from undercutting the licensed cannabis market.

In passing Proposition 64, voters made it clear that while adults should be able to partake in the intoxicating effects of cannabis, there must be strong regulations to ensure that the products are safe, only available to those over 21, do not appeal to children, and are properly taxed at the state and local level. We have seen intoxicating hemp undermine each of these principles, simply because the tetrahydrocannabinol (THC) compound is hemp-derived, which is the same compound found in intoxicating cannabis. This paradox creates a glaring disparity in the treatment of identical THC products.

Local governments have a stake in shaping the broader statewide landscape of cannabis regulation in California, as it has a significant impact on our operations and serves as an important economic driver in many communities. Our licensed operators are required to pay state and local taxes that fund critical programs including youth education, prevention, early intervention, and treatment; environmental protection and restoration; and public safety-related activities.

Enforcement efforts are already spread thin across a variety of state and local law enforcement agencies with insufficient resources and competing priorities. This is particularly true for local law enforcement and code enforcement agencies, which shoulder a significant amount of the burden for addressing illicit activity. These agencies depend on local taxes, as well as state dollars like the Public Health & Safety Grant Program, to keep their communities safe and bolster the licensed market. Allowing intoxicating products to circumvent the established taxation framework eats away at our already limited resources.

To create stronger state protections from the dangerous effects of unregulated THC, emergency regulations were approved on September 23, 2024, requiring industrial hemp food, food additives, beverages, and dietary supplements intended for human consumption to have no detectable THC per serving, setting a minimum age to purchase hemp products at 21, and limiting the number of servings of hemp products to five per package. On March 6, 2025, the California Department of Public Health filed a notice to extend these regulations.

AB 8 would improve this situation by codifying safeguards and integrating the manufacturing, distribution, and sale of hemp and hemp products into the regulatory structure of cannabis. For these reasons, CSAC, RCRC, and Cal Cities **support** AB 8. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org, Sarah Dukett (RCRC) at sdukett@rcrcnet.org, or Jolena Voorhis (Cal Cities) at jvoorhis@calcities.org.

Sincerely,

Jordan Wells
Legislative Advocate
California State
Association of Counties

Sarah Dukett
Policy Advocate
Rural County
Representatives of
California

Jolena Voorhis
Legislative Affairs,
Lobbyist
League of California
Cities

cc: The Honorable Cecilia Aguiar-Curry, Majority Leader of the California State Assembly
Honorable Chair, Members, and Staff, Senate Business, Professions and Economic Development Committee

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 25, 2025

The Honorable Scott Wiener
Chair, Senate Committee on Budget and Fiscal Review
1021 O Street, Room 1200
Sacramento, California, 95814

RE: Housing Budget Trailer Bill (AB 130, Assembly Committee on Budget)
As amended on June 24, 2025 – Notice of Support

Dear Senator Wiener,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of the CEQA reform and voluntary Vehicle Miles Traveled (VMT) mitigation banking program as outlined in AB 130.

First, we support the inclusion of provisions to exempt environmentally friendly housing projects from the California Environmental Quality Act (CEQA) when they comply with local requirements. CSAC recognizes the need for affordable housing that is accessible and available to meet the needs of California residents at all income levels and in all geographic areas. This important statute will expedite the development of much-needed housing while ensuring environmental sustainability. The CEQA reforms in this bill, which were part of AB 609 (Wicks), provide a pragmatic solution to addressing the state's housing crisis by streamlining the approval process for housing developments that adhere to local zoning regulations and standards, reducing unnecessary redundancy while maintaining environmental oversight. Additionally, this approach appropriately recognizes that not all housing projects have the same environmental impact. Infill housing near jobs, schools, and public transit significantly reduces greenhouse gas emissions, making communities more resilient and accessible. By removing CEQA barriers for projects in infill locations that are not environmentally sensitive or hazardous, AB 130 strikes a critical balance between housing expansion and environmental stewardship. This bill's language will help make homeownership more accessible, reduce homelessness, and build a sustainable future for our communities.

Additionally, the proposed VMT mitigation banking program is an innovative and flexible approach that offers a practical, cost-effective solution to meet CEQA transportation mitigation requirements while advancing California's critical goals for affordable housing,

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

infrastructure development, and climate resilience. By allowing developers to contribute to a centralized mitigation bank, the program streamlines compliance, reduces project delays, and ensures that mitigation investments deliver long-term environmental and community benefits.

We are particularly encouraged by the program's emphasis on:

- Affordable housing development near jobs and transit, which reduces VMT and supports walkable, connected communities;
- Infrastructure investments that unlock constrained sites and encourage infill development;
- Active transportation improvements that enhance safety, mobility, and access for all Californians;

The VMT mitigation proposal builds on successful local models and offers a scalable, statewide framework that maintains environmental protections on transportation projects while providing much-needed flexibility for developers and local governments. It is a smart, forward-looking approach that aligns with California's climate, housing, and equity priorities.

We urge your support for this important legislation and stand ready to work with you to ensure its successful implementation. Should you have any questions regarding our position, please do not hesitate to contact me at mneuburger@counties.org.

Sincerely,

Mark Neuburger
Legislative Advocate
CSAC

CC : The Honorable Mike McGuire Senate President pro Tempore
The Honorable Monique Limón Senate President pro Tempore- Elect
Honorable Members and Consultants, Senate Committee on Budget and Fiscal Review
Christopher Woods, Chief Fiscal Adviser, Budget Director, Office of Senate President pro Tempore Mike McGuire
Elisa Wynne, Staff Director, Senate Committee on Budget and Fiscal Review
Kirk Feely, Fiscal Director, Senate Republican Caucus
Gabriel Petek, Legislative Analyst, Legislative Analyst's Office
Carolyn Chu, Chief Deputy Legislative Analyst, Legislative Analyst's Office

CSDA

3V
THREE VALLEYS
MUNICIPAL WATER DISTRICT

ACHD
ASSOCIATION OF CALIFORNIA
HEALTHCARE DISTRICTS

ACWA

CAPA

CARPD
California
Association
of Recreation
and Park
Districts

CMUA
CALIFORNIA MUNICIPAL UTILITIES
ASSOCIATION

CSAC

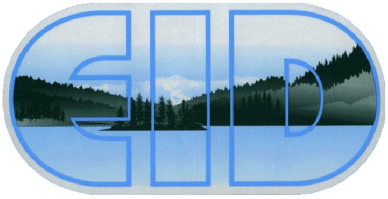
CALLEGUAS
MUNICIPAL WATER
DISTRICT

CMCA
CALIFORNIA MUNICIPAL
CLERKS ASSOCIATION

DESERT WATER

LEADERSHIP • PARTNERSHIP • STEWARDSHIP
EAST VALLEY
WATER DISTRICT

emwd


EID

75TH ANNIVERSARY
Inland Empire Utilities Agency
A MUNICIPAL WATER DISTRICT

Irvine Ranch
Water District

LAS VIRGENES
MUNICIPAL
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WATER DISTRICT

LEAGUE OF
CALIFORNIA
CITIES

MesaWater
DISTRICT©

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

PUENTE
BASIN
WATER
AGENCY

ROWLAND WATER
DISTRICT

RCRC

CITY OF SAN BERNARDINO
WATER DEPT.

WQA
SAN GABRIEL BASIN
WATER QUALITY AUTHORITY

SAN GABRIEL VALLEY
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ECONOMIC PARTNERSHIP

SAN GABRIEL VALLEY
MUNICIPAL
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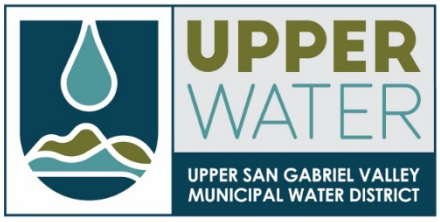
AZUSA | SIERRA MADRE | MONTEREY PARK | ALHAMBRA

Solano County
Water Agency

SCWC


UPPER
WATER
UPPER SAN GABRIEL VALLEY
MUNICIPAL WATER DISTRICT

URBAN COUNTIES
OF CALIFORNIA

Walnut Valley
Water District

WRD
WATER REPLENISHMENT DISTRICT

WESTERN
MUNICIPAL WATER DISTRICT

PVID
EST. 1918

June 26, 2025

The Honorable María Elena Durazo
Chair, Senate Local Government Committee
State Capitol, Room 407
Sacramento, California 95814

RE: Assembly Bill 259 (Rubio) – Support [As Amended April 21, 2025]
Hearing Date: July 2, 2025 – *Senate Local Government Committee*

Dear Senator Durazo:

The undersigned organizations write to express our support for Assembly Bill 259 (Rubio), which will preserve important teleconferencing procedures that have afforded public agency board members the flexibility to attend meetings they might have otherwise not been able to attend.

Recognizing the evolving landscape of public meetings and the demonstrated value of remote participation options when members of governing bodies are unable to attend a physical gathering, the Legislature passed Assembly Bill 2449 in 2022, which amended the Ralph M. Brown Act. Beginning in 2023, special districts and other local agencies began using the procedures established by AB 2449, successfully facilitating remote participation for officials that would otherwise been encumbered by illness, official travel, or medical emergency. The provisions of that bill, having been negotiated by civil society groups and local government stakeholders, contained numerous requirements, including the presence of an in-person quorum at the official meeting location.

While the provisions added by AB 2449 were modified slightly by technical amendments made by subsequent legislation, the January 1, 2026 sunset included in the original bill remains. To preserve the flexibility provided by AB 2449, Assembly Bill 259 would extend the sunset date on those provisions to January 1, 2030, thereby preserving the remote meeting procedures added by the earlier legislation. AB 259 would not otherwise change any other elements of the remote meeting provisions.

For these reasons, we the undersigned are proud to support Assembly Bill 259 (Rubio). Please feel free to contact us if you have any questions.

Sincerely,

Marcus Detwiler
Legislative Representative
California Special Districts Association

Matthew Litchfield
General Manager
Three Valleys Municipal Water District

Sarah Bridge
VP, Advocacy & Strategy
Association of California Healthcare Districts

Julia Hall
State Legislative Director
Association of California Water Agencies

Kim Rothschild
Executive Director
California Association of Public Authorities for IHSS

Ethan Nagler
Legislative Representative
California Association of Recreation & Park Districts

Andrea Abergel
Director of Water
California Municipal Utilities Association

Eric Lawyer
Legislative Advocate
California State Association of Counties

Kristine McCaffrey, P.E.
General Manager
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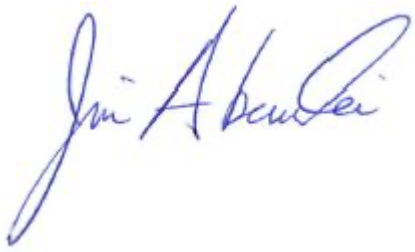
Dane Hutchings
Legislative Representative
California Municipal Clerks Association

Steve Johnson
General Manager
Desert Water Agency

Michael Moore
General Manager/CEO
East Valley Water District

Joe Mouawad, P.E.
General Manager
Eastern Municipal Water District



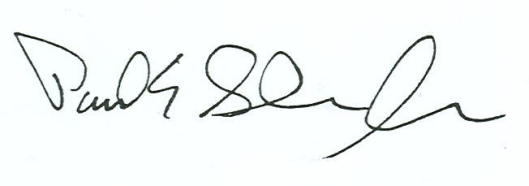
Jim Abercrombie
General Manager
El Dorado Irrigation District

Shivaji Deshmukh, P.E.
General Manager
Inland Empire Utilities Agency

Paul Cook
General Manager
Irvine Ranch Water District

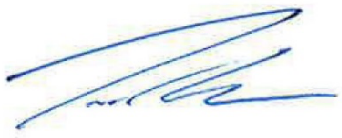
David Pedersen
General Manager
Las Virgenes Municipal Water District

Johnnie Piña
Legislative Affairs, Lobbyist
League of California Cities



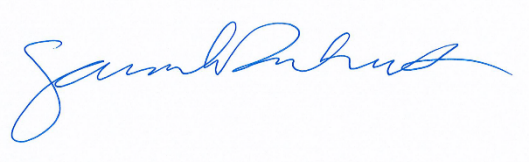
Paul E. Shoenberger, P.E.
General Manager
Mesa Water District

Deven Upadhyay
General Manager
Metropolitan Water District of Southern California



Jared Macias
Administrative Officer
Puente Basin Water Agency

Tom Coleman
General Manager
Rowland Water District



Sarah Dukett
Policy Advocate
Rural County Representatives of California

Miguel J. Guerrero, P.E.
General Manager
San Bernardino Municipal Water Department

Randy Schoellerman
Executive Director
San Gabriel Basin Water Quality Authority

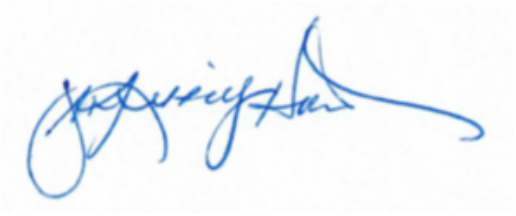
Luis Portillo
President & CEO
San Gabriel Valley Economic Partnership

Darin Kasamoto
General Manager
San Gabriel Valley Municipal Water District

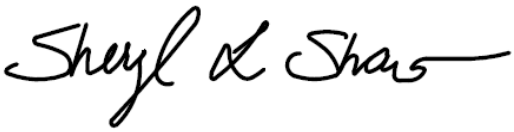
Chris Lee
General Manager
Solano County Water Agency

Charles Wilson
Executive Director
Southern California Water Coalition

Thomas Love
General Manager
Upper San Gabriel Valley Municipal Water District



Jean Hurst
Legislative Advocate
Urban Counties of California



Sheryl L. Shaw, P.E.
General Manager
Walnut Valley Water District

Stephan Tucker
General Manager
Water Replenishment District

Craig D. Miller, P.E.
General Manager
Western Municipal Water District

Dennis LaMoreaux
General Manager
Palmdale Water District

James Lee
General Manager
Crescenta Valley Water District

Fred Jung
Mayor
City of Fullerton

CC: The Honorable Blanca Rubio
Members, Senate Local Government Committee
Jonathan Peterson, Principal Consultant, Senate Local Government Committee
Ryan Eisberg, Consultant, Senate Republican Caucus
Brady Borcherding, Deputy Legislative Secretary, Office of Governor Newsom

June 26, 2025

The Honorable Thomas Umberg, Chair
Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

RE: AB 283 (Haney) – IHSS Employer-Employee Relations Act
As Amended on June 12, 2025 – Support if Amended
Set for hearing July 1, 2025

Dear Chair Umberg:

On behalf of the California State Association of Counties (CSAC) and the County Welfare Directors Association of California (CWDA), we are writing to share our Support if Amended position on AB 283 authored by Assembly Member Matt Haney. This legislation would transition collective bargaining for the In-Home Supportive Services (IHSS) program from counties to the state.

The IHSS program serves roughly 840,000 consumers in California and allows qualified aged, blind, or disabled persons to receive supportive services from a provider to help them live at home. IHSS services are delivered by roughly 750,000 providers. Counties have proudly partnered with the state on the IHSS program since it was realigned in 1991 and are committed to the success of this program, which has helped reduce care costs and improve the well-being of individuals.

Existing law deems a Public Authority (PA) as the employer of record for the purposes of collective bargaining for IHSS providers. This bill establishes the IHSS Employer-Employee Relations Act, which would shift collective bargaining for IHSS providers from counties and PAs to the state. Our associations have worked closely with the author and sponsors on a series of amendments to address county and PA concerns in three key areas – (1) Providing clarity that the state would be responsible for the nonfederal share of costs for wage and benefit increases agreed to in statewide bargaining; (2) Removing county and public authority administrative functions from the scope of representation in statewide bargaining; and (3) Ensuring full funding for counties to comply with any new program requirements agreed to in statewide bargaining.

We are appreciative of the collaborative engagement in being able to reach agreement on amendments that address these issues. Key amendments in the June 12 version of the bill include:

- Removing several items from the scope of representation that are core county and public authority administrative functions (provider registry, backup provider system, provider recruitment and retention).
- Adding county and public authority representatives to the advisory committee.
- Requiring consultation with those representatives about county and public authority programmatic and fiscal implications prior to finalizing a memorandum of understanding.
- Clarifying that the bill does not change any other aspect of the IHSS employment relationship.

In addition, the author has indicated agreement on two additional amendments and it's our understanding that they will be incorporated as the bill moves forward to the next committee. These amendments are:

> Amend Section 12306.16(e) of the Welfare and Institutions Code
> (e) The rebased County IHSS MOE shall only be adjusted pursuant to subdivisions (c) and (d). *The rebased County IHSS MOE shall not be adjusted based on any provision of any memorandum of understanding, or addenda, appendices, or side letters thereto, between the state and recognized employee organizations, as defined in Section 110003 of the Government Code.*
>
> Amend Section 12306.16(b)(3)(B) of the Welfare and Institutions Code
> (B) The state shall pay 100 percent of the allowable nonfederal share of county administration and public authority administration costs for each county. *The state shall also pay 100 percent of the nonfederal share of county administration and public authority administration costs for each county of any administration costs resulting from the provisions of any memorandum of understanding, or addenda, appendices, or side letters thereto, between the state and recognized employee organizations, as defined in Section 110003 of the Government Code.* Once the county's share of the appropriated General Fund moneys is exhausted, the county shall pay 100 percent of the remaining nonfederal share of county administration and public authority administration costs. Each county shall pay 100 percent of any costs for public authority administration that are in excess of the county's approved rate approved pursuant to subdivision (a) of Section 12306.1. At the end of the fiscal year, any remaining unspent General Fund moneys allocated for IHSS county administration or public authority administration shall be redistributed through a methodology determined in conjunction with the County Welfare Directors Association of California or the California Association of Public Authorities.

The above amendments will provide clarity that counties would not be responsible for the increased costs that the state agrees to in statewide bargaining, including wage and benefit increases and new program requirements. This fiscal protection language is essential as counties would have no ability to manage the associated costs of statewide bargaining within Realignment funding and county budgets.

IHSS is a vital program for older adults and people with disabilities that families rely on to care for their loved ones. CSAC and CWDA believe that with the amendments outlined in this letter, AB 283 would transition collective bargaining to the state in a manner that would maintain the consumer-driven foundation of the IHSS program, mitigate for any fiscal, legal, and administrative impacts to counties, and help attract additional quality providers to sustain the growth of the program.

If you have any questions about our position, please don't hesitate to contact us. Thank you for your consideration.

Sincerely,

Justin Garrett
Senior Legislative Advocate
California State Association of Counties
jgarrett@counties.org

Carlos Marquez III
Executive Director
County Welfare Directors Association
cmarquez@cwda.org

cc: The Honorable Matt Haney, California State Assembly
Members and Consultants, Senate Judiciary Committee

June 24, 2025

The Honorable Lola Smallwood-Cuevas, Chair
Senate Labor, Public Employment, and Retirement Committee
1021 O Street, Suite 6530
Sacramento, CA 95814

Re: **AB 339 (Ortega): Local public employee organizations: notice requirements**
As amended 6/18/25 – OPPOSE
Awaiting hearing – Senate Labor, Public Employment, and Retirement Committee

Dear Senator Smallwood-Cuevas:

On behalf of the Urban Counties of California (UCC), California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Association of California Healthcare Districts (ACHD), California Special Districts Association (CSDA), League of California Cities (CalCities), Public Risk Innovation, Solutions, and Management (PRISM), Association of California Water Agencies (ACWA), County Health Executives Association of California (CHEAC), California State Sheriffs' Association (CSSA), Contra Costa County, Fresno County, Lake County, Merced County, Placer County , Riverside County, Sacramento County, San Joaquin County, San Mateo County, Santa Clara County, San Bernardino County, Ventura County, South San Joaquin Irrigation District, American Council of Engineering Companies of California, California Geotechnical Engineering Association (CalGeo), the American Institute of Architects California, Transportation California, California Building Officials (CALBO), California Association of Recreation and Park Districts (CARPD), California Transit Association, California Association of Sanitation Agencies (CASA), the California and Nevada Civil Engineers and Land Surveyors Association (CELSA), Helix Water District, the California Association of Public Hospitals and Health Systems (CAPH), California Animal Welfare Association (CalAnimals), Bay Area Air District, California-Nevada Section, American Water Works Association (CA-NV AWWA), the Jurupa Community Services District, the American Public Works Association – California Chapters, the California Park and Recreation Society (CPRS), Contra Costa Water District, and the American Society of Civil Engineers (ASCE)-Region 9, we write in respectful opposition to Assembly Bill 339, as recently amended. This measure would require the governing body of a local public agency (non-school) to provide written notice to the employee organization no less than 60 days prior to issuing any request for proposals, request for quotes, or renewing or extending an existing contract to perform services that are within the scope of work of the job classifications represented by the recognized employee organization, and to engage in potentially extensive and lengthy negotiations regarding each of those actions upon request. AB 339 would be impractical in its execution, is unworkable for ensuring provision of public services, and undermines local labor negotiations.

AB 339 applies to any contract that is within the scope of work of any job classification represented by a recognized employee organization; for local agencies with represented workforces, this essentially means nearly every contract would be subject to notice and possible meet and confer. This provision is considerably broader than the existing requirement for bargaining under the Meyers-Milias Brown Act (MMBA); under existing law, where contracting out is legally permissible, local agencies are still required to "meet and confer in good faith" with any affected bargaining unit prior to making any decision that.is.within.the.scope.of.representation. (Gov. Code, §§ 3505.) However, existing law incorporates several common-sense limitations upon the requirement to meet and confer – including where there is a longstanding past practice of contracting for particular services, or where contracting out is contemplated in the applicable MOU. AB 339 subverts these well-settled principles to the detriment of local public services.

It is important to note that an administrative remedy is already available to recognized employee organizations when they believe that a local agency has neglected to meet existing notification and meet and confer requirements regarding contracting. Failure to adhere to existing requirements under the MMBA and related case law subjects a local agency to a potential unfair labor practice charge at the Public Employment Relations Board (PERB).

The lack of definition of emergency or exigent circumstances in AB 339 undermines existing emergency contracting authority; further, this provision only applies to the initial notice requirement – not the meet and confer provisions – making the provision nearly meaningless in an emergency circumstance. You are undoubtedly aware of the considerable responsibility assumed by local agencies in a natural disaster, public health emergency, or other local crisis. As first responders, local agencies rely on existing statutes that allow for considerable flexibility to ensure the safety and well-being of our communities.

In addition, AB 339 will significantly delay public works projects and could grind building permit processing, design, and construction of needed housing or infrastructure projects to a halt. Public works projects involve multiple phases of design, which require a diverse array of services – including site assessments, geotechnical services, land surveys, plan check, and traffic studies, to name just a few – that cannot be fully known until earlier phases have completed, making it impossible for agencies to complete all of AB 339's notification pauses at the outset of a project. These notices would therefore be compounded, causing projects to be delayed by multiples of the 60-day pause before a shovel ever touches the ground. Since the bill applies to any services within any recognized employee organization's scope, this will include instances in which none of an agency's employees currently, or ever, have performed those services. The vast majority of agencies lack the resources and expertise to have 100 percent of their design needs performed by its own engineers, planners, and other design professionals on staff. Should one of these agencies need to transfer responsibility for conducting vital design services – plan checking an application for a housing development permit, for example – they could be left without qualified staff to perform those essential functions for at least 60 days.

The bill also deters local agencies from working in partnership with local community organizations, who are at the front lines of providing critical local services, and who are already under scrutiny by the federal government, adding considerable uncertainty to their ongoing financial viability.

Finally, sponsors continue to assert that documents associated with a Request for Proposals (RFP), Request for Quotes (RFQ), contract extensions, and contract renewals are not disclosed to the public. In truth, RFPs and RFQs are typically public by nature and subject to competitive bidding processes and regulations, while contracts are almost always disclosable public records under the Public Records Act. We.dispute.that.local.agencies.are.inappropriately.withholding.public. records.and.further.disagree.that.local.agencies.are.failing.to.comply.with.existing.notification. requirements.under.the.MMBA¡.If.either.were.true?there.are.already.existing.remedies.for. sponsors.to.address.these.issues¡

Like previous unsuccessful proposals that have sought to undermine local agencies' ability to contract for public services, AB 339 represents a sweeping change to the fundamental work of local governments, but we remain unaware of a specific, current, and widespread problem that this measure would resolve or prevent. We are keenly aware, though, of the very real harm that could result from this measure. AB 339 will not improve services, reduce costs, or protect employees. As

a result, we are opposed. Should you have any questions about our position, please reach out directly.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

Sarah Dukett
Policy Advocate
Rural County Representatives of California

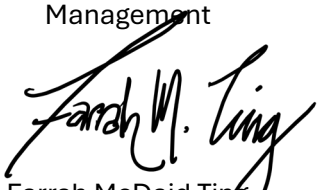
Sarah Bridge
Legislative Advocate
Association of California Healthcare Districts

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Johnnie Pina
Legislative Affairs, Lobbyist
League of California Cities

Jason Schmelzer
Legislative Advocate
Public Risk Innovation, Solutions, and Management

Julia Bishop Hall
Director of State Legislative Relations
Association of California Water Agencies



Farrah McDaid Ting
Deputy Director of Policy
County Health Executives Association of California

Cory M. Salzillo
Legislative Director
California State Sheriffs' Association

Candace Andersen
Chair, Contra Costa County Board of Supervisors

Susan Parker
County Administrative Officer
County of Lake

Joshua Pedrozo
Chairman
Merced County Board of Supervisors

Supervisor V. Manuel Perez, Chair
Riverside County Board of Supervisors

Paul Canepa
Chair
San Joaquin County Board of Supervisors

Erin Evans-Fudem
Legislative Deputy County Counsel
Office of the County Counsel
County of Santa Clara

Peter M. Rietkerk
General Manager
South San Joaquin Irrigation District

Noah Smith, PE, GE
President
California Geotechnical Engineering Association

Bonnie Gore
Chair (District 1)
Placer County Board of Supervisors

Elisia De Bord
Governmental Relations and Legislative Officer
County of Sacramento

Connie Juárez-Diroll
Chief Legislative Officer
County of San Mateo

Eric P. Angstadt
CELSA
Executive Secretary

Tyler Munzing
Director of Government Affairs
American Council of Engineering Companies of California

Scott Terrell
Director of Government Relations
The American Institute of Architects California

Mark Watts
Legislative Advocate
Transportation California

Buddy Mendes, Chairman
Fresno County Board of Supervisors

Michael Pimentel
Executive Director
California Transit Association

Jessica Gauger
Director of Legislative Advocacy & Public Affairs
California Association of Sanitation Agencies

Brian Olney
General Manager
Helix Water District

Karen Lange
Legislative Advocate
California Animal Welfare Association

Matthew Wheeler, DPPD
Executive Director
California Building Officials (CALBO)

Dane Hutchings
Legislative Representative
California Association of Recreation and Park Districts

Dawn Rowe
Chairman
County of San Bernardino

Sue Mosburg
Executive Director
American Water Works Association, California-Nevada Section

Chris Berch, P.E.
General Manager
Jurupa Community Services District

Katie Rodriguez
Vice President of Policy and Government Relations
California Association of Public Hospitals and Health Systems (CAPH)

Philip M. Fine, Ph.D.
Executive Officer/APCO
Bay Area Air District

Joubin Pakpour
Director
American Public Works Association — California Chapters

Elizabeth Espinosa
Legislative Advocate
County of Ventura

Stephanie Stephens
Exeuctive Director
California Park and Recreation Society

Ernesto A. Avila
Board President
Contra Costa Water District

Yazdan Emrani
Region 9 Director
American Society of Civil Engineers (ASCE-Region 9

cc: Members and Consultants, Senate Labor, Public Employment and Retirement Committee
The Honorable Liz Ortega, California State Assembly

June 23, 2025
The Honorable Thomas Umberg
Chair, Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

RE: **AB 340 (Ahrens) Employer-Employee Relations Confidential Communications.**
OPPOSE *(As Amended March 5, 2025)*

Dear Senator Umberg,

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), the Association of California Healthcare Districts (ACHD), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Association of Joint Powers Authorities (CAJPA), Public Risk Innovation, Solutions, and Management (PRISM), the California Association of School Business Officials (CASBO), the California

Association of Recreation and Park Districts (CARPD), California County Superintendents, the School Employers Association of California (SEAC), Small School Districts' Association (SSDA), Community College League of California, Schools Excess Liability Fund (SELF), and the University of California, write in respectful opposition to Assembly Bill (AB) 340. This bill would restrict an employer's ability to conduct internal investigations to the detriment of employees' and the public's safety and well-being, adding new costs and liability for public employers. Moreover, the substantive provisions of the bill create restrictions mirroring a privilege.

Previous Legislation and Previous Veto
Our concerns with AB 340 are consistent with the issues raised in response to previously introduced legislation, AB 2421 (Low, 2024), AB 729 (Hernandez, 2013), AB 3121 (Kalra, 2018) and AB 418 (Kalra, 2019). The issues are succinctly captured in the AB 729 veto message from Governor Brown, which states: "I don't believe it is appropriate to put communications with a union agent on equal footing with communications with one's spouse, priest, physician or attorney. Moreover, this bill could compromise the ability of employers to conduct investigations into workplace safety, harassment and other allegations."

New Costs and Added Liability for the State, Local Governments, and Schools
In order to conduct proper investigations that uphold the public's trust, protect against the misuse of public funds, and ensure the safety and well-being of both public employees and the public at large, it is critical that a public employer has the ability to interview all individuals with relevant information to ascertain the facts and understand the matter fully. AB 340 would increase investigation and litigation costs for the state as well as local governments and schools by creating incomplete investigations, since all appropriate employees with relevant information cannot be questioned. Costs and risks may also increase as conduct challenged as unlawful under the bill's provisions is adjudicated before the Public Employment Relations Board (PERB). For schools, this is a drain of Proposition 98 funding.

Inconsistent with PERB Decision
AB 340 states that its prohibition on employer questioning is intended to be consistent with, and not in conflict with, William S. Hart Union High School District (2018) PERB Dec. No. 2595. This is problematic for two reasons. First, the bill is inconsistent with that PERB decision. That decision engaged in a circumstantial analysis to determine whether employer questioning was prohibited or not, while weighing the employee's and the employer's interests. AB 340 goes far beyond that, forgoing any circumstantial analysis or weighing of interests. It categorically prohibits questioning of confidential employee representative communications, except for narrow, limited exceptions. Second, we are not aware of evidence that PERB is denying the interests of employees on this issue, raising the question of whether a legislative solution is warranted.

Expansion of New One-Sided Standard
AB 340 would create a de facto prohibition on employers requesting a court to compel disclosure of purportedly confidential communications, which is the same outcome as if the communication was privileged in those circumstances. This will have a significant impact on judicial and administrative proceedings.

Endangers Workplace Safety
AB 340 interferes with the ability to interview witnesses because it would prohibit public agencies from questioning any employee or "representative of a recognized employee organization, or an exclusive representative" about communications between an employee and a "representative of a recognized employee organization, or an

exclusive representative." While AB 340 includes a narrow exception for criminal investigations, and provides that it does not supersede Gov. Code 3303, many necessary investigations are still subject to the bill's limitations, putting safety at risk.

This bill would hinder employees who wish to voluntarily report an incident or testify in front of necessary misconduct investigations since an employer would be prohibited from certain lines of questioning. It would also limit the ability of public employers to carry out the requirements of recently enacted law, Senate Bill 553 (Cortese, 2023), which includes conducting investigations into workplace safety, harassment, and other allegations. As of January 1, 2025, SB 553 allows collective bargaining representatives standing to seek temporary restraining orders (TRO) in connection with workplace violence. AB 340 will create a problematic scenario wherein a TRO may be obtained but an employer could not fully investigate the underlying facts. AB 340 lacks guardrails to prevent potential conflicts of interest that could arise during employee safety issues.

Specific to local educational agencies, TROs are being sought by teachers and classroom aides against students with a disability, who may not have full control of their motor skills or have a cognitive impairment. School employers shared that their ability to gather details and intercede results in alternatives to a TRO that are more productive for their staff and students. Otherwise, school employers may be exposed to greater liability as they try to adhere to contractual agreements for a student's Individualized Educational Plan.

Administrative investigations are also critical tools for public agency employers when protecting minors under the supervision and care of their employees. As it relates to preventing childhood sexual assault and misconduct, perpetrators are not often caught in the act at a school site or facility but rather discovered through investigations conducted by the employer through either building evidence for what may lead to a criminal investigation or removing an employee before misconduct may occur. The current liability statewide for school employers alone is approximately $3 billion dollars and districts need every tool available to prevent future misconduct.

AB 340, as drafted, would tie the hands of school employers in seeking better options for student educational outcomes and taking proactive steps for general safety.

Making matters worse, employers may not even know they are acting contrary to AB 340's restrictions by communicating with staff, because only the employee or the representative would know or could decide when a communication was made "in confidence." This could affect day-to-day activities and critical government operations.

For the reasons discussed above, the organizations listed below are respectfully opposed to AB 340. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
aarona@csda.net

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Schools Excess Liability Fund (SELF)
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Andrew Martinez
Senior Director of Government Relations
Community College League of California
amartinez@ccleague.org

Mario Guerrero
Legislative Director, Business Operations
University of California
State Governmental Relations
Mario.Guerrero@ucop.edu

CC:

The Honorable Patrick Ahrens
Honorable Members, Senate Judiciary Committee
Christian Kurpiewski, Principal Consultant, Senate Judiciary Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 25, 2025

The Honorable Jesse Arreguín, Chair
Senate Human Services Committee
1020 N Street, Room 521
Sacramento, CA 95814

RE: AB 346 (Nguyen) In-home supportive services: licensed health care professional certification.
As Amended May 23, 2025 – SUPPORT
Set for hearing June 30, 2025

Dear Senator Arreguín,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of Assembly Bill 346 authored by Assembly Member Stephanie Nguyen. This measure streamlines the process for In-Home Supportive Services (IHSS) clients to receive paramedical services by expanding the types of health care providers authorized to sign paramedical forms and reducing unnecessary administrative burdens that currently delay access to services.

California's population of older adults aged 65 and older is projected to reach 25 percent of the population, or 8.6 million Californians, by 2030. IHSS is an important tool in meeting the goals of the Master Plan for Aging to enable this growing population to age with dignity and independence, as well as assisting adults with disabilities. Currently, roughly 730,000 IHSS providers deliver services to over 830,000 recipients in the state. This includes paramedical services, which are tasks necessary to help maintain the client's health. Types of paramedical services include administration of medications, wound care, or injections, among others.

While the California Department of Social Services (CDSS) allows any licensed healthcare professional to sign off on the initial form required for a client to obtain IHSS, the department only allows limited types of healthcare professionals to sign the additional form required to authorize paramedical services. Specifically, only physicians, surgeons, podiatrists, and dentists are authorized to sign this additional form.

CSAC Officers

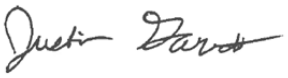
President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

The current requirements for authorizations of both the health care certification and paramedical forms can prevent timely delivery of services essential for the client's health. Counties cannot authorize paramedical services without the second form, which can lead to significant delay for a client to obtain paramedical services from their IHSS provider. This delay can be exacerbated by overwhelmed healthcare systems.

AB 346 allows the same licensed health care professionals who sign the IHSS health care certification form to also sign the paramedical form. Aligning which licensed health care professionals may sign the paramedical and health care certification forms will reduce administrative barriers. By broadening the types of health care providers who are authorized to sign these forms, IHSS clients can have both forms signed at the same time by the same provider, thereby reducing delays, improving health outcomes, and better fulfilling the goals of the IHSS program.

For these reasons, CSAC supports AB 346. Should you have any questions about our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org. Thank you for your consideration.

Sincerely,



Justin Garrett
Senior Legislative Advocate

cc: The Honorable Stephanie Nguyen
Honorable Members and Consultants, Senate Human Services Committee

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 25, 2025

The Honorable Monique Limón
Chair, Senate Natural Resources and Water Committee
1021 O Street, Room 3220
Sacramento, CA 95814

RE: AB 441 (Hadwick) Wildfire prevention: Office of Wildfire Technology Research and Development: wildfire mitigation program.
As Amended on May 23, 2025 – Notice of SUPPORT
To be heard in Senate Natural Resources and Water Committee

Dear Chair Limón,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support AB 441 (Hadwick), which would extend the sunset date for the Office of Wildfire Technology Research and Development (OWTRD) and remove the sunset date for the California Wildfire Mitigation Financial Assistance Program (CWMP).

In recent years, California has experienced an increasing frequency and intensity of disasters, including wildfires, droughts, floods, and public health emergencies. Each disaster disrupts entire communities, often exceeding the response capacity of local jurisdictions. California's counties have learned difficult lessons from these crises, including the devastating 2025 Los Angeles County Wildfires, which further underscores the urgency of streamlining rebuilding efforts.

Counties play a critical role in disaster preparedness, response, and recovery. Local governments are often the first to respond, triggering state and federal aid while leading long-term rebuilding efforts. With 58 counties varying in geography, demographics, and resources, emergency management and homeland security policies must be flexible and adaptable to meet the distinct needs, risks, and capacities of each county.

CSAC strongly supports expanding funding for home hardening and community resilience. Home hardening describes vegetation management compliance and building materials used to resist the intrusion of flames or embers projected by a wildland fire. CSAC supports expanding programs like the Office of Emergency Services (CalOES) and CalFIRE Home

CSAC Officers
President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Hardening Initiative and advocates for direct funding to counties beyond bond-dependent measures.

Assembly Bill 441 is a crucial step in strengthening California's wildfire mitigation efforts. By extending the sunset date of the Office of Wildfire Technology Research and Development and permanently establishing the California Wildfire Mitigation Program, the bill ensures continued access to cutting-edge technologies and financial assistance for high-risk communities. With increasing disaster frequency and intensity, home retrofitting and fire-hardening initiatives are essential to protecting vulnerable residents, particularly in rural areas. Strengthening these programs guarantees that Californians will have the support needed to mitigate wildfire impacts long into the future.

The pilot version of this program has been very successful but is just getting started. The pilot program was first launched in 2023 and is intended to provide funding for defensible space and ignition resistant retrofits to harden approximately 2,500 homes in six counties. According to Cal OES's website, there are 252 active applications, 134 assessments are currently complete, 24 homes are in progress, and 18 homes are fully completed.

For these reasons, CSAC supports continuing this important program and urges your aye vote on AB 441. Should you have any questions on our position, please contact me at cfreeman@counties.org.

Sincerely,

Catherine Freeman
Senior Legislative Advocate, CSAC

cc: The Honorable Heather Hadwick, California State Assembly, District 1

June 19, 2025

The Honorable Lola Smallwood-Cuevas
Chair, Senate Labor, Public Employment and Retirement Committee
1021 O Street, Room 6740
Sacramento, CA 95814

RE: AB 538 (Berman): Public works: payroll records
As Introduced February 11, 2025 – OPPOSE
Set to be heard in the Senate Labor, Public Employment and Retirement June 25, 2025

Dear Senator Smallwood-Cuevas,

The California State Association of Counties (CSAC), League of California Cities (Cal Cities), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC) respectfully oppose Assembly Bill (AB) 538 because it would place an unnecessary burden on local agencies.

Current law requires contractors and subcontractors for public works projects to maintain payroll records for all workers employed as part of a public works project. Current law also requires that a certified copy of those records be made available upon request by either a body awarding the contract (e.g. a county or city) or by the Division of Labor Standards and Enforcement (DLSE). Current law empowers DLSE, not awarding bodies, to penalize contractors or subcontractors for failing to respond to a records request by either an awarding body or DLSE. Despite this reality, the bill only requires local agencies to seek out records not in their possession and lacks any language to compel the only body with enforcement powers to seek out the records.

Additionally, Section 2 declares that the bill is not a reimbursable state mandate, asserting that the only costs incurred by a local agency or school district will be due to changes to a crime or infraction. We believe the language is inappropriate and should be amended to clearly declare that the bill would establish a new mandate reimbursable under state law, as the bill clearly mandates a new activity by local agencies: seeking records from a public works contractor or subcontractor when the local agency is not in possession of those records.

We believe this bill unnecessarily adds to the administrative burdens of local agencies at a time when their resources are being further stretched due to increasing state mandates, emergency response, and federal uncertainty.

For these reasons, CSAC, UCC, RCRC and Cal Cities regretfully oppose AB 538 (Berman) and respectfully request your NO vote. Should you have any questions or concerns regarding our position, please do not hesitate to contact us.

Sincerely,

Eric Lawyer
Legislative Advocate

Jean Kinney Hurst
Legislative Advocate

California State Association of Counties
elawyer@counties.org

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

Urban Counties of California
jkh@hbeadvocacy.com

Damon Conklin
Legislative Advocate
League of California Cities
DConklin@calcities.org

cc: The Honorable Marc Berman, California State Assembly
Members, Senate Labor, Public Employment and Retirement Committee
Alma Perez, Chief Consultant, Senate Labor, Public Employment and Retirement Committee
Cory Botts, Consultant, Senate Republican Caucus

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1100 K Street, Suite 101 | Sacramento, CA 95814

June 23, 2025

The Honorable Jesse Arreguín
Chair, Senate Human Services Committee
1020 N Street, Room 521
Sacramento, CA 95814

RE: AB 689 (Rubio) Foster youth: disaster aid assistance.
As Introduced February 14, 2025 – SUPPORT
Set for hearing on June 30, 2025

Dear Senator Arreguín,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of Assembly Bill 689 by Assembly Member Blanca Rubio. This measure would establish a statewide Child Welfare Disaster Response Program to provide funding to support the immediate needs of foster children and youth and their caregivers in disaster-impacted communities.

Over the past decade, California has experienced a sharp rise in devastating natural disasters, including wildfires, floods, and other climate-related emergencies. While these events are traumatizing to all impacted communities, foster youth and their caregivers often face disproportionate harm, with greater difficulty accessing housing, transportation, and essential personal items.

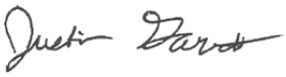
AB 689 will help stabilize children and youth in foster care during times of disaster by establishing a dedicated funding source for support during the first 180 days following a local or state emergency declaration. Importantly, AB 689 authorizes county child welfare departments to apply for these funds to distribute among impacted clients, ensuring aid will quickly be distributed to those in need.

For these reasons, CSAC supports AB 689. Should you have any questions about our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org. Thank you for your consideration.

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Blanca Rubio, California State Assembly
Honorable Members and Consultants, Senate Human Services Committee

June 19 2025

TO: Members, Senate Labor, Public Employment and Retirement Committee

SUBJECT: AB 692 (KALRA) EMPLOYMENT:CONTRACTS IN RESTRAINT OF TRADE OPPOSE – AS AMENDED MAY 29, 2025

The California Chamber of Commerce and the organizations listed below respectfully **OPPOSE AB 692 (Kalra). AB 692** will disincentivize voluntary benefits programs for employees and is duplicative of existing law regarding reimbursements and trainings. It imposes significant penalties for any good faith error and improperly sweeps in independent contractors in a way that is at odds with the legal definition of an independent contractor.

AB 692 Disincentivize Voluntary Benefits Programs for Employees

Many California employers presently offer monetary bonuses or educational opportunities to their employees. For example, employers may pay a worker's tuition to get an advanced degree or additional certification or pay a signing bonus at the outset of employment. These mutually beneficial programs give the employee an opportunity to improve their resume/skills or receive additional money up front while the employer simultaneously makes an investment in its workforce. Understandably, employers are more motivated to invest in these types of voluntary benefits if they know the worker will be at the company for a longer period of time. It is therefore common for employers to offer more benefits if the worker agrees to remain at the company for a certain amount of time afterwards. Conversely, it does not make sense to offer an employee a signing bonus only to have them quit two weeks later.

AB 692 jeopardizes these benefits because it would classify them as a "debt" if the employer placed conditions on the bonus or education. In other words, **AB 692** would prohibit an employer from requiring

that the worker remain at the company for a certain amount of time after receiving a benefit. Any requirement that the worker pay back the signing bonus would be considered unlawful, subjecting the employer to penalties and a private right of action. The unintended consequence of this bill is that it removes the incentive for employers to offer these benefits programs. That is especially true for small and medium-sized businesses in light of the *mandatory* minimum $5,000 penalty.[1]

The May 23rd and 29th amendments do not address our concerns. Those amendments merely create a very narrow exception for certain "degrees". Not only does this not address programs like hiring/signing bonuses or other educational credentials, but the exception also does not apply if the employee is terminated for misconduct

In sum, **AB 692** does not help workers – it hurts them.

Existing Labor Law Already Requires Employers to Pay for Employer Required Trainings or Any Other Expense

The intent behind **AB 692** appears to be aimed at prohibiting employers from requiring specific training and then saddling employees with a bill for that training upon termination of employment. That scenario is already addressed under Labor Code section 2802. Under section 2802, employers must reimburse employees for all necessary expenses and/or losses incurred in the course and scope of their employment. Courts have interpreted this provision quite broadly in favor of the employee. For example, if an employee makes a mistake at work that costs the employer money – such as damaging valuable equipment – the employee cannot be required to reimburse the employer. Or if the employer requires the employee to use their cell phone to conduct work, the employer must provide reimbursement, even if the employee is not incurring any additional cost because they have an unlimited data plan.

Regarding training, section 2802 requires reimbursement for required training as well as payment for time spent in training. DLSE guidance provides:

- There's generally no requirement that an employer pay for training leading to licensure or the cost of licensure for an employee.
- If the license is required by the state or locality as a result of public policy, the employee bears the cost of licensing.
- If the license isn't actually required by statute or ordinance but the employer requires the training and/or licensing simply as a requirement of employment, the employer must reimburse for the cost.

DLSE Opinion Letter No. 1994.11.17; DLSE *Enforcement Manual* section 29.2.3.4

In Re Acknowledgment Cases, 239 Cal.App.4th 1498 (2015) is illustrative of how section 2802 operates regarding training. A police department required all newly hired police officers to attend and graduate from a department-specific program. If the officers did not stay for at least five years, they were required to reimburse the department for the training costs. The court held that this violated section 2802. The department could require officers to pay for state-mandated training, but not the training that was specific to that department.

Further, Labor Code section 2802.1 specifically addresses the requirement for employers to pay education and training costs for employees who provide direct patient care. That statute was added just a few years ago based on the concern that some healthcare facilities were not correctly complying with section 2801.

AB 692's purported intent regarding training is therefore already addressed under sections 2802 and 2802.1. **AB 692** is not adding anything of substance here. Rather, its broad provisions will unintentionally deter employers from offering employee benefits like those discussed above.

AB 692's Application to Independent Contractors is At Odds with the Concept of an Independent Contractor

[1] The bill states that any violation "shall" result in a minimum penalty of $5,000 or actual damages, whichever is greater.

None of **AB 692**'s provisions should apply to independent contractors. For example, Labor Code 2802's requirements apply to employees, not independent contractors. This makes sense given the concept of an independent contractor – someone who performs work outside of the company's usual course of business, is free from control of the company regarding the performance of the work, and is customarily engaged in an independent trade or business. Independent contractors often work for many different companies. Anything specific to the needs of a specific company would be negotiated for in the terms and price of the contract between the contractor and that company.

In summary, **AB 692** will disincentivize employers investing in their own workforce by paying for additional certifications or degrees, and will make routine practices such as signing bonuses impossible to offer.

For these and other reasons, we respectfully **OPPOSE AB 692.**

Sincerely,

Ashley Hoffman
Senior Policy Advocate
California Chamber of Commerce

Acclamation Insurance Management Services (AIMS)
Allied Managed Care (AMC)
American Staffing Association
California Apartment Association
California Association for Health Services at Home
California Attractions and Parks Association
California Business Properties Association
California Chamber of Commerce
California Hospital Association
California Hotel and Lodging Association
California League of Food Producers
California Life Sciences
California Restaurant Association
California Retailers Association
California Staffing Professionals
California State Association of Counties
California Trucking Association
Coalition of Small and Disabled Veteran Businesses
Dairy Institute
Flasher Barricade Association (FBA)
National Federation of Independent Business
Public Risk Innovation Solutions and Management (PRISM)
Rual County Representatives of California
Santa Clarita Valley Chamber of Commerce
Society for Human Resource Management (SHRM)
Urban Counties of California

cc: Legislative Affairs, Office of the Governor
Erika Salazar, Office of Assemblymember Kalra
Consultant, Senate Labor, Public Employment and Retirement Committee
Cory Botts, Senate Republican Caucus

AH:ldl

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 27, 2025

The Honorable Susan Rubio
Chair, Senate Insurance Committee
1020 N Street, Room 258
Sacramento, CA, 95814

RE: AB 888 (Calderon) California Safe Homes grant program.
As amended on May 29, 2025 – Notice of Support
To be heard in the Senate Insurance Committee on July 9, 2025

Dear Chair Rubio,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of AB 888 (Calderon). The bill would create the California Safe Homes grant program with the purpose of reducing local and state wildfire losses.

Counties across the state are building resilience through risk mitigation work, however, communities are not seeing the benefits of this work reflected in the cost and availability of insurance coverage. One of the biggest barriers to completing more risk mitigation work is funding. Counties have invested heavily to build out community resilience and it is critical that all levels of government share the cost of this work. AB 888 would provide an additional funding source for counties working to mitigate risk across their communities from the devastating impacts of wildfires.

Counties play a critical role in disaster preparedness, response, and recovery. Local governments are often the first to respond, triggering state and federal aid while leading long-term rebuilding efforts. To protect communities from future disasters state and federal partners must invest in proactive mitigation measures. AB 888 is necessary to bolster community resiliency efforts, minimizing the financial impact caused by wildfires.

For these reasons, CSAC supports AB 888. Should you have any questions regarding our position, please do not hesitate to contact me at cfreeman@counties.org.

Sincerely,

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Catherine Freeman
Senior Legislative Advocate
California State Association of Counties

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1100 K Street, Suite 101 | Sacramento, CA 95814

June 23, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
California State Capitol, Room 412
Sacramento, CA 95814

RE: AB 896 (Elhawary) Foster care: placement transition planning.
As Amended March 17, 2025 – SUPPORT
Set for Hearing in Senate Appropriations Committee on June 30, 2025

Dear Senator Caballero,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of Assembly Bill 896 by Assembly Member Sade Elhawary. This measure would require the California Department of Social Services (CDSS) to issue guidance on best practices and strategies for supporting foster children who are transitioning between placement settings, as well as require each county child welfare agency to adopt placement transition policies.

Over the last decade, California has made significant progress in reducing the number of children and youth in foster care. While counties make every effort to minimize disruptive or traumatic care placement changes, transitions are sometimes necessary to ensure the health and safety of the child or to support permanency outcomes such as reunification or adoption. Despite the thousands of placement changes that occur each year, California lacks statewide guidance on the best practices and policies for managing these transitions.

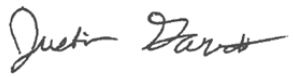
AB 896 requires CDSS, in consultation with counties and stakeholders, to issue guidance to county child welfare agencies on best practices and strategies for successful placement transition planning. Additionally, this measure equips counties with the necessary resources and tools to develop comprehensive transition planning policies. By recognizing the importance of planning and managing placement transitions in a way that is trauma-informed, youth-centered, and tailored to each child's individual needs, AB 896 will promote greater placement stability and support the long-term well-being of children and families in the foster care system.

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

For these reasons, CSAC is pleased to support AB 896. Should you have any questions about our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Sade Elhawary, California State Assembly
Honorable Members and Consultants, Senate Appropriations Committee
Amanda Kirchner, Director of Legislative Advocacy, CWDA

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 23, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
California State Capitol, Room 412
Sacramento, CA 95814

RE: AB 898 (Bryan) The Family Urgent Response System.
As Introduced February 19, 2025 – SUPPORT
Set for Hearing in Senate Appropriations Committee on June 30, 2025

Dear Senator Caballero,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of Assembly Bill 898 by Assembly Member Isaac Bryan. This measure would introduce improvements to the Family Urgent Response System (FURS) to ensure FURS teams can be responsive and proactive to the needs of vulnerable families and youth.

FURS is a coordinated statewide, regional, and county-level 24/7 response system designed to provide collaborative and timely state-level phone-based response and county-level in-home, in-person mobile response during situations of instability, to preserve the relationship of the caregiver and the child or youth. Established in 2019 and implemented beginning in 2021, FURS has been a valuable tool for supporting current and former foster youth, caregivers, and families, as well as stabilizing foster care placements. FURS currently receives approximately 5,000 calls annually from foster youth and their caregivers.

To access FURS, a caregiver or foster youth must first contact the state-level hotline, which is staffed with operators trained in conflict resolution and de-escalation techniques who provide immediate assistance over the phone to help defuse conflict and to provide focused engagement and assessment to make a referral to the county mobile response system for further support as appropriate. If dispatched by the state hotline, the county mobile response team provides face-to-face, in-home response, supportive services to address situations of instability, preserve the relationship of the caregiver and the child or youth, develop health conflict resolution and relationship skills, promote healing as a family, and stabilize the situation.

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

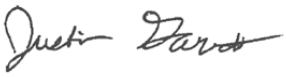
Statute requires the state hotline to dispatch county mobile response teams, which occurs for only 30 percent of calls to the hotline. County mobile response teams are not being fully utilized to support caregivers, children and youth. This results in missed opportunities to prevent a crisis that can lead to placement disruption. Additionally, eligibility for FURS is limited to current and former foster youth, which misses an important opportunity for the program to strengthen at-risk families and prevent entries into foster care.

AB 898 clarifies that counties have the flexibility to dispatch FURS teams, when not otherwise responding to calls placed through the statewide hotline, to respond to local needs without a statewide hotline call. This change would allow county mobile response teams to perform valuable outreach and education to families about FURS, provide support to foster youth with acute needs, and provide transition support during placement changes, among other important services. AB 898 still preserves prioritization for calls made through the statewide hotline and requires that FURS retain the capacity to serve that population.

AB 898 also permits counties to utilize their FURS teams to support families who are receiving family preservation and voluntary or court-ordered family maintenance services, thereby reducing entries into foster care. Finally, the bill requires the county child welfare, probation and behavioral health agencies to revisit their local implementation plan every other year to support cross-system collaboration and enhance overall program efficacy.

This measure will improve lifelong outcomes of those currently served by FURS and expand the benefits of FURS to at-risk families and youth who are currently excluded from these vital supports. For these reasons, CSAC is pleased to support AB 898. Should you have any questions about our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Isaac Bryan, California State Assembly
Honorable Members and Consultants, Senate Appropriations Committee
Amanda Kirchner, Director of Legislative Advocacy, CWDA

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 27, 2025

The Honorable Catherine Blakespear
Chair, Senate Environmental Quality Committee
1021 O Street, Room 3230
Sacramento, CA 95814

RE: AB 993 (Hadwick) Hazardous materials management: Rural CUPA Reimbursement Account.
As amended on May 23, 2025 – Notice of SUPPORT
Waiting to be heard in the Senate Environmental Quality Committee

Dear Chair Blakespear,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of AB 993 (Hadwick), which would expand eligibility for funding from the Rural Certified Unified Program Agency (CUPA) Reimbursement Account.

CUPAs are local agencies tasked with implementing and enforcing California's Unified Program, a consolidation of six environmental and emergency management programs that protect Californians from hazardous materials and hazardous waste. In 2000, the Legislature created the Rural CUPA Reimbursement Program with the passage of SB 1824 (Kelley). While 13 counties are currently eligible for funding from the Account, 12 additional counties meet the population threshold but are ineligible because their CUPAs were certified before January 1, 2000. According to the Unified Program Administrative and Advisory Group's 2022-2027 Strategic Plan, one key performance indicator/target is the expansion of the Rural Reimbursement grants by 2027.

AB 993 would make every county with a population of less than 150,000 eligible for this funding, regardless of the date of certification. For these reasons, CSAC supports AB 993. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

Sincerely,

Jordan Wells

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Legislative Advocate
California State Association of Counties

CC : The Honorable Heather Hadwick, Member of the California State Assembly
Members and Staff, Senate Environmental Quality Committee

June 23, 2025

The Honorable Thomas Umberg
Chair, Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

RE: **AB 1109 (Kalra) Evidentiary Privileges: Union Agent-Represented Worker Privilege.**
OPPOSE *(As Introduced February 20, 2025)*

Dear Chair Umberg,

The California Special Districts Association (CSDA), League of California Cities (Cal Cities), California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), Association of California School Administrators (ACSA), University of California, Association of California Healthcare Districts (ACHD), California Association of Recreation and Park Districts (CARPD), School Employers Association of California (SEAC), California School Boards Association (CSBA), California County Superintendents, Small School Districts' Association (SSDA), Alameda County Office of Education, Dublin Unified School District,

Pleasanton Unified School District, Community College League of California, California Association of Joint Powers Authorities (CAJPA), Schools Excess Liability Fund (SELF), Public Risk Innovation, Solutions, and Management (PRISM), California Association of School Business Officials (CASBO), and the University of California, write to inform you of our respectful opposition to Assembly Bill (AB) 1109 (Kalra). This bill would inhibit an employer's ability to conduct investigations to the detriment of employees' and the public's safety and well-being, add new costs and liability for public employers, and interfere with administrative and judicial proceedings necessary to protect the public's interest and public agencies' duty to be responsible stewards of public funds.

Previous Legislation and Previous Veto
Our concerns with AB 1109 are consistent with the issues raised in response to previously introduced legislation, AB 729 (Hernandez, 2013), AB 3121 (Kalra, 2018) and AB 418 (Kalra, 2019), AB 2421 (Low, 2024), and AB 340 (Ahrens, 2025). The issues are succinctly captured in the AB 729 veto message from Governor Brown, which states: "I don't believe it is appropriate to put communications with a union agent on equal footing with communications with one's spouse, priest, physician or attorney. Moreover, this bill could compromise the ability of employers to conduct investigations into workplace safety, harassment and other allegations."

Creation of New One-Sided Standard, Lacking Important Safeguards
The scope of privilege akin to an attorney-client relationship is carefully defined by state law. Privilege is by design narrow in scope to protect the confidentiality and integrity of relationships, both medical/professional and familial in nature, where highly sensitive and deeply personal information is exchanged. AB 1109 fails to recognize this well-established threshold for creating a right of privilege and instead would create a new, broad privilege for public employees and their unions, without requisite limits on how the privilege functions.

Unlike other privileges that apply to both sides of the litigation or proceedings such as the attorney-client privilege, AB 1109 does not bestow the same privilege upon management-labor negotiator communications, or communications among members of management regarding labor union disputes or grievance issues. Consequently, in labor related proceedings before courts and the California Public Employment Relations Board (PERB) hearings, an employer could be forced to disclose all such communications, while the union or employee could shield relevant and otherwise discoverable communications from disclosure pursuant to the terms proposed in AB 1109.

The bill would also impede a public employer's ability to defend itself or assert its interests in other adversarial processes given that the bill applies to compelled disclosures to any court or to any administrative board or agency, or in any arbitration or other proceeding. Proceeding is defined in Evidence Code Section 901 to mean "any action, hearing, investigation, inquest, or inquiry (whether conducted by a court, administrative agency, hearing officer, arbitrator, legislative body, or any other person authorized by law) in which, pursuant to law, testimony can be compelled to be given." The word "grievance" is included in the bill for purposes of defining a covered union agent, adding more uncertainty as to the types of matters covered by the bill.

AB 1109 is lacking important guardrails commonly applicable to other privileges in the professional context, including:

- The lack of standards to prevent the potential for conflict between the proposed union agent privilege and the union agent's duty to represent the bargaining unit as a whole. A union agent could not reconcile the privilege of one employee with his or her duty to represent a second employee if those

employees are adverse to each other. The potential for conflict is further exacerbated because, unlike attorney-client privilege where the client is the holder of the privilege, AB 1109 would make both the union agent and the employee holders of the privilege.
- The lack of education, training, certification or qualifications required for a union agent to hold the privilege under AB 1109. Other professional, non-familial privileges require years of education, certification and training.
- The lack of enforcement mechanisms, such as sanctions or penalties, to ensure proper use and observance of the privilege. With the other professional privileges, there is typically a disciplinary or licensing body with the authority to take corrective action in the event the privilege is abused or misused. There is no such mechanism in AB 1109.

Taken together, AB 1109's expansion of the evidentiary privilege is anything but straightforward, raising irreconcilable conflicts and concerns not present with established evidentiary privileges.

New Costs and Enhanced Impacts for the State, Local Governments, and Schools
In order to conduct proper investigations that uphold the public's trust, protect against the misuse of public funds, and ensure the safety and well-being of both public employees and the public, it is critical that a public employer has the ability to interview all individuals with relevant information to ascertain the facts and understand the matter fully. AB 1109 would increase investigation and litigation costs for the state as well as local governments and schools due to incomplete investigations, because appropriate witnesses may refuse to disclose relevant information based on a faulty or incorrect understanding of AB 1109. For schools, this is a drain of Proposition 98 funding.

Although AB 1109 provides that a union agent may reveal a confidential communication made to the agent if required to do so by a court order, this provision notably fails to include "a represented employee or former represented employee" as a party that could be compelled to reveal a confidential communication between the employee and union agent pursuant to a court order. Moreover, this provision would add significant costs to the state, local governments, and schools, requiring them in some cases to expend resources to obtain a court order to reveal allegedly "confidential communications" related to otherwise routine workplace investigations as discussed further below.

Endangers Workplace Safety
AB 1109 potentially interferes with the ability to obtain information from witnesses relevant to workplace safety and other matters. The bill permits the silencing of employees who wish to voluntarily report knowledge or information related to an incident or from testifying because it provides that "[a] represented employee or represented former employee also has a privilege to prevent another from disclosing a confidential communication between the employee and a union agent that is privileged pursuant to this section." While AB 1109 includes narrow exceptions for criminal proceedings, the disclosure of many important communications may be hindered by the bill's limitations, putting safety at risk. Shockingly, the bill's exception providing that there is no privilege if the union agent reasonably believes that disclosure is necessary to prevent a criminal act that the union agent reasonably believes is likely to result in death or substantial bodily harm leaves employee safety entirely to the discretion of the union agent.

This bill would also limit the ability of public employers to carry out the requirements of recently enacted law, Senate Bill 553 (Cortese, 2023), which includes conducting investigations into workplace safety, harassment, and other allegations. As of January 1, 2025, SB 553 allows collective bargaining representatives standing to seek temporary

restraining orders (TRO) in connection with workplace violence. AB 1109 will create a problematic scenario wherein a TRO may be obtained by a union but an employer would be inhibited from investigating the underlying facts. As noted above, AB 1109 lacks guardrails to prevent potential conflicts of interest that could arise during employee safety issues.

For the reasons discussed above, the organizations listed below are respectfully opposed to AB 1109. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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CC:

The Honorable Ash Kalra
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Christian Kurpiewski, Deputy Chief Counsel, Senate Judiciary Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

June 26, 2025

The Honorable Caroline Menjivar, Chair
Senate Health Committee
1021 O Street, Room 3310
Sacramento, CA 95814

RE: AB 1288 (Addis and Valencia) Registered environmental health specialists.
As Amended April 10, 2025 – SUPPORT
Set for Hearing on July 2, 2025

Dear Senator Menjivar,

On behalf of the California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and Urban Counties of California (UCC), we write in support of Assembly Bill 1288, authored by Assembly Members Addis and Valencia, which would extend the time in which local health/environmental health departments may train and employ a local Registered Environmental Health Specialist (REHS) trainee from three years to five years. The latest amendments also include additional provisions to strengthen and facilitate the process to become an REHS trainee, allow them to successfully complete their trainee period, and allow more opportunities to take the certification test.

Currently, certification for the REHS program is administered by the California Department of Public Health (CDPH). The program ensures that a certified REHS has met adequate education, training and experience requirements and has passed a comprehensive state examination. While working towards certification, individuals may be employed as a REHS trainee by local health/environmental health departments for up to three years. However, limited examination offerings and strict time limitations governing how often a trainee may take the exam have resulted in trainees being reassigned or released – even if they wish to continue to pursue a career as a certified REHS. The current state examination passage rate averages around 60 percent.

The REHS plays a critical role in safeguarding our communities, and recent public health emergencies and climate-driven disasters have only increased counties' need for a strong REHS workforce. AB 1288 as amended will aid counties in addressing ongoing recruitment and retention challenges currently impacting the public health workforce and expand opportunities for entry-level employees to continue advancing their careers within their own communities.

For these reasons, our organizations are pleased to support AB 1288. Please do not hesitate to reach out with any questions.

Sincerely,

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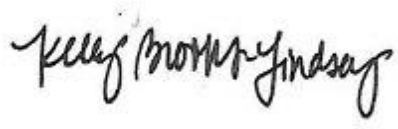

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cc: The Honorable Dawn Addis, California State Assembly
The Honorable Avelino Valencia, California State Assembly
Honorable Members and Consultants, Senate Health Committee
Farrah McDaid Ting, Deputy Director of Policy, County Health Executives Association of California

June 27, 2025

The Honorable Thomas Umberg
Chair, Senate Committee on Judiciary
1021 O Street, Room 6740
Sacramento, CA 95814

Re: **AB 1331 (Elhawary): Workplace surveillance**
As amended 6/19/2025 – OPPOSE
To be heard in Senate Committee on Judiciary

Dear Chair Umberg,

On behalf of the California State Association of Counties (CSAC); Urban Counties of California (UCC); Rural County Representatives of California (RCRC); Public Risk Innovation, Solutions, and Management (PRISM); California Special Districts Association (CSDA); Association of California School Administrators (ACSA); League of California Cities (Cal Cities); California School Boards Association (CSBA); and the California Association of Recreation and Park Districts (CARPD) we write in respectful opposition to AB 1331 (Elhawary), which would vastly complicate the routine work of local governments and schools, endanger our ability to perform essential public services, impede our ability to manage and respond to workplace violence threats, and make local governments and schools vulnerable to waste, fraud, and abuse of public resources.

Our coalition insists that this bill is wrongly applied to local governments and should be **amended to fully exempt local agencies and schools**. The bill imposes unnecessary security risks for local agencies, schools, and the public we serve. The right of public employees to organize is well protected from the types of behavior this bill intends to address. Our coalition would remove opposition if local agencies were removed from the bill.

Needlessly endangers public employees and those they serve
Even with the proposed amendments, AB 1331 would needlessly interfere with the ability of local agencies to protect foster children, keep kids safe in schools, and maintain the safety of their workforce or the communities they serve—including election facilities,

libraries, and shelters for the unhoused. The unpublished amendments allow for the use of surveillance tools if "required by state and federal law or regulations". While this amendment may allow *some* facilities to continue to use necessary security tools, it is unclear the extent to which this amendment will allow public agencies to protect critical infrastructure and government facilities. Put simply, state and federal laws are rarely prescriptive about the use of security tools – the need for security is implicit. Further, this attempt to exclude certain locations, including airports, from the law's provisions is a clear acknowledgement that AB 1331 creates security gaps for critical facilities.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life and appreciate that one could imagine that appropriate limits are needed to prevent employers from snooping into the private lives of their employees. However, the scope of this bill is vast and would deem basic security tools used for everyday work, including security cameras, collaboration tools like Teams or Slack, or GPS tools used to track fleets, to be "surveillance tools" whose use would be constricted. Under AB 1331, any device that collects or facilitates collection of data of an employee's movements, actions, communications, or behaviors, is deemed a surveillance tool that cannot be used when employees are off duty or in "employee only" areas.

AB 1331 will needlessly endanger public workforces and severely impair our ability to prevent and investigate instances of workplace violence. The bill restricts the ability for public agencies to review data collected through a surveillance tool in any "off-duty area," defined to include breakrooms and cafeterias unless directed by a court order or upon request by either a court, law enforcement, or by an employee. These restrictions needlessly inhibit the use of tools that can be used to keep employees safe from workplace violence incidents or, worse, provide the worst actors with a roadmap of locations where they can more easily hide bad behavior, including abuse of vulnerable populations like children, the elderly, or those experiencing mental health crises.

Under AB 1331, employees must be allowed to leave behind surveillance tools during off-duty hours or when they are entering off-duty areas. It's unclear how these rules would apply to a variety of tools that public employees may be required to use, including emergency alarms for teachers, body cameras for law enforcement, or tools used for public vehicle fleets, including dash cameras, speed monitors, or GPS tracking. Consider election workers, who could be allowed to leave behind tracking tools used to track the delivery and pickup of ballots. The ability for an employee to claim they had simply been "at rest," will give those who are rightfully required to wear surveillance tools an easy out for any behavior that conflicts with laws or agreements that require wearable tools for public and employee safety.

Unfortunately, we have seen rising hostility and threats against government entities and their workforces. That includes violence and threats of violence against government

employees whose job requires them to serve the public, like library staff, teachers, firefighters, benefits officers, among myriad other examples. It also includes public officials who are frequently targeted with threats or actual violence, including election workers, health officers, and public officials. AB 1331 would heighten vulnerability for public servants at a time of strong anti-government sentiment.

Amendments raise new privacy and cost concerns
The ability for employees to request video footage also raises critical privacy concerns about the disclosure of those in the footage, placing public agencies in the difficult position of potentially violating an employee's privacy or incurring considerable costs to blur or pixelate the images of those in the footage.

Significantly expands government liability
To compound all of our concerns, AB 1331 imposes severe financial penalties for non-compliance. For public agencies, these penalties can be staggering and severely impact funds needed to provide essential public services. At a time of significant budget constraints at the state and local level, now is not the time to subject public agencies to nuclear fines for providing basic security measures.

Inappropriately applies to public agencies
We understand the sponsors are advancing this bill to address activities by private employers that use security tools to undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union activities. For example, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Put simply, public agencies use the "surveillance tools" defined in this law to protect public resources, employees, and the public – not to influence employee organization activities. We once again urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1331 and urge your "NO" vote.

Sincerely,

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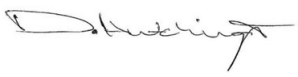

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CC: The Honorable Sade Elhawary, Member, California State Assembly
Members and Consultants, Senate Committee on Judiciary

June 27, 2025

The Honorable Thomas Umberg
Chair, Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

Re: **AB 1337 (Ward): Information Practices Act of 1977**
As amended May 23, 2025 – OPPOSE
To be heard in the Senate Judiciary Committee July 15, 2025

Dear Chair Umberg,

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), California Special Districts Association (CSDA), the Association of California Healthcare Districts (ACHD), California Welfare Directors Association (CWDA), California Association of Public Hospitals (CAPH), California Association of Joint Powers Authorities (CAJPA), the County Health Executives Association of California (CHEAC), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Municipal Clerks Association (CMCA), the District Hospital Leadership Forum (DHLF), the California Hospitals Association (CHA), and the California Association of Recreation and Park Districts (CARPD), we write to respectfully oppose AB 1337 (Ward), which would amend the Information Practices Act of 1977 ("IPA," or "the Act") and apply it to all 58 counties, 483 cities, over 1,000 school districts and county offices of education, approximately 2,200 independent special districts, and the hundreds of JPAs, regional bodies, and other public agencies.

AB 1337 would raise significant questions for how state and local agencies can continue to operate critical safety net programs and impose severe restrictions on data sharing in ways that undermine integrated service approaches that support timely and efficient access to essential benefits. AB 1337 ignores the myriad of privacy and confidentiality laws already in place for local governments and, instead, imposes a clumsy set of provisions that create conflicts with longstanding confidentiality laws, complicate data reporting needed for accountability efforts, and endanger federal funding, among other risks. This is a costly, unnecessary change that could jeopardize essential services and harm the communities we serve: students, the unhoused, the elderly, and those on the economic margins who rely on public services for healthcare, housing, energy, and the services that comprise the social safety net.

While AB 1337 has many provisions, it would impose three new overlapping standards for how local agencies manage public data:

- *Use* of data is constrained to only the purpose for which it was collected, except as authorized or required by state law [Civil Code § 1798.20(b)];
- *Transfer* of data, including between state and local agencies, must be necessary both to perform constitutional and statutory duties and must "further the purpose" for which the data were collected [Civil Code § 1798.24(e)]; and
- *Disclosure* of data, including reporting of aggregated data, is prohibited if it could, instead of the current standard that it would, identify an individual to whom it pertains [Civil Code § 1798.24].

Complicates Data Sharing and Reporting

Local governments and the state have made considerable progress in providing wraparound services to those most in need by improving connectivity of resources. This progress has been made under the "no wrong door" approach. AB 1337 would undermine this hard-earned progress.

The proposed amendments to Civil Code § 1798.24(d) & (e) would prohibit government agencies from sharing data with other government agencies unless it "furthers the purpose," for which the data were collected. This vague definition creates more questions than answers compared to the current standard that the data are shared in a way that "is related to," or "compatible with" the purpose for which the information was acquired.

AB 1337 will make benefit applications more time consuming and less efficient by requiring repeated collection of information, representing a step backwards at a time when local agencies are trying to make the public benefit application process more efficient.

AB 1337 would complicate the efforts of the CalAIM Justice-Involved initiative, which relies on information sharing to ensure that the justice-involved community is connected to healthcare services as they re-enter the community. These same concerns apply to local reentry resource centers, which provide a range of services to help justice-involved individuals reestablish themselves in the community.

By requiring individuals to opt into data sharing, reporting will be biased towards those who choose to opt into sharing their data – creating unknown impacts that will make it harder to discern which populations are underrepresented in service delivery. Civil Code § 1798.24 would prohibit agencies from disclosing any data that *could* identify an individual, which could have a chilling effect on reporting outcomes of public services. Public employees could reasonably choose not to publish reports that, while designed to account for service delivery across demographic and economic strata, could place them at risk of a misdemeanor. We are concerned this could impact the vulnerable populations who rely most on public services.

Hampers Abilities to Respond to Unlawful Activity

The proposed law would severely restrict the ability of a public agency to respond to a criminal act. The proposed amendments to Civil Code § 1798.24(l) & (o) would remove longstanding exceptions to the act that allow disclosures in response to a search warrant or to aid an investigation into unlawful activity.

This change would put agencies in an absurd position when they have knowledge about a member of the public implicated in a crime. If this law were to take effect, agencies would have to obtain permission from an accused individual before they could share identifying information needed to aid an investigation or fulfill a search warrant. Further, local agency employees could be accused of obstruction charges or other penalties from noncompliance in response to search warrants.

For agencies responsible for child and family services, this change could restrict information sharing with law enforcement in ways that could endanger child safety and make it harder for those agencies to evaluate risk and safety. Social workers could be held liable with a misdemeanor or termination for attempting to ensure child safety – an outcome that is clearly not the intent of this bill, but an example of

the unintended consequences created when bills are drafted without the input of impacted local agencies.

Expands Legal Liability for Public Agencies and their Workforce

In addition to applying the IPA to local agencies, the bill would revise the law in several ways that will expose agencies and their workforce to new legal liabilities, including through a private right of action. The bill would amend Civil Code § 1798.24 to prohibit disclosure of any personal information that "could," link the information to an individual, rather than the current standard that prohibits disclosure of information that "would," link to an individual. This change alone will dramatically redefine the IPA in ways that will impose uncertainty on how agencies can share data needed to report outcomes or comply with state and federal grant requirements.

AB 1337 adds to these concerns by expanding liability for public employees. The proposed change to Civil Code § 1798.55 would expose public employees to discipline, including termination, for "negligent" violations of the act, a broad expansion of the current standard for "intentional," violations. Additionally, the proposed change to Civil Code § 1798.57 would expose public employees to misdemeanors even if there is no economic loss or personal injury due to a disclosure. At a time when public agencies are facing workforce recruitment and retention challenges, now is not the time to expose public employees to legal liabilities arising from compliance with a law that is suddenly imposed upon them. In addition to harming the public workforce, this will add to local agency liability as they will be required to respond to legal claims for penalized employees.

Ignores and Conflicts with Existing Privacy and Confidentiality Laws

Local agencies and schools are already required to comply with a variety of state and federal data privacy laws tailored to conform with specific programs administered by counties, including the following examples.

Health

- The Health Insurance Portability and Accountability Act (HIPAA) and the Confidentiality of Medical Information Act (CMIA) regarding Medi-Cal beneficiaries and those receiving care at public hospitals;
- 42 CFR Part 2 for confidentiality of substance use disorder patient records;
- Welfare and Institutions Code (WIC) § 5325.1 regarding the right to privacy for persons receiving treatment for a mental illness;
- WIC § 827 regarding the right to privacy for juvenile records; and

- Penal Code § 13823.5(c)(2) regarding confidentiality of sexual assault examination records.

Social Services

- WIC § 10850 *et seq.* regarding confidentiality of applications and records related to public social services;
- WIC § 17006 regarding confidentiality of county general assistance records;
- WIC § 17006.5 regarding disclosure of county general assistance records to law enforcement;
- WIC § 14100.2 regarding confidentiality and management of Medi-Cal records; and
- Penal Code § 11675 for case records related to child protective services claims.

Elections

- Elections Code §§ 2166, 2166.5, and 2166.7 regarding requests for confidentiality of voter records;
- Elections Code § 2194 regarding confidentiality of an affidavit of voter registration and limitations on its use; and
- Elections Code § 17100(c) regarding limitations on public access to nomination documents and petitions.

Schools

- Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g) regarding students' privacy.

Criminal Justice

- Penal Code § 11100 *et seq.* regarding custody of criminal records and statistics;
- Penal Code § 11164 *et seq.* regarding confidentiality of child abuse and neglect reports; and
- Penal Code § 13100 *et seq.* regarding records and data for criminal offenders.

Finance

- Revenue and Taxation Code §§ 63.1(i) and 69.5(n) regarding confidentiality of property transfer records; and
- Revenue and Taxation Code §§ 408, 408.1, 408.2, 451, 481, and 1609.6 regarding the confidentiality and disclosure rules related to assessor duties.

Public Utilities

- Public Utilities Code § 8381 for customers of publicly-owned utilities.

Libraries

- Gov. Code § 7927.105 for confidentiality of registration and circulation records of library users; and
- Welfare and Institutions Code §§ 10850 and 14100.2 for confidentiality of records and data sharing of personal identifying information.

In addition to state and federal law, several counties have adopted ordinances and established departments focused on data privacy and confidentiality.

Put simply, local agencies take data privacy and confidentiality seriously and comply with a network of specific privacy and confidentiality laws. AB 1337 upends this longstanding framework with a blanket policy that conflicts with some existing laws or creates confusion and inconsistent compliance based on how agencies are used to compliance. While the California Consumer Privacy Act expressly provides that its requirements do not apply to information governed by CMIA, AB 1337 makes no attempt to square its broad requirements with the litany of existing privacy laws that apply to local programs.

For example, under HIPAA, de-identified individual data cannot be disclosed without authorization. However, population-level data are generally available to the public for statistical research if the data cannot reasonably ascertain an individual's identity. HIPAA provides significant detail as to how disclosures and covered entities are required to provide an accounting of disclosures to individuals. AB 1337 imposes a new overlapping standard that any data disclosed "cannot identify any individual," creating a confusing standard that competes with longstanding principles.

To cite another conflict, HIPAA allows covered entities to disclose protected health information without an individual's consent for purposes including treatment, payment, or health care operations[1]. AB 1337 ignores these carefully designed rules and imposes significant uncertainty as to how patient data can be shared for delivery of medical care by public hospital systems.

County child welfare and behavioral services laws restrict even acknowledging whether an individual is receiving care, unless an entity is specifically authorized by

[1] 5 C.F.R. § 164.502(a)(1)

law[2]. AB 1337 would establish contrary rules that endanger child privacy by allowing for the release of information upon consent and by other circumstances established in Civil Code § 1798.24.

Endangers Federal Funding

AB 1337 would prohibit data sharing with the federal government unless expressly authorized by state law. This change alone could threaten federal funding agreements and create preemption issues that local governments would be forced to navigate. By restricting data sharing with the federal government, vital funding for homelessness services, public health grant programs, victim witness programs, and task forces to combat human trafficking would be threatened.

Imposes Expensive Requirements on Local Agencies, with No Time or Resources

The bill in its current form does not appear to contemplate the vast technical effort that would be required for thousands of state and local agencies to come into compliance. The effort would certainly require technological changes, including in many cases new equipment, coding for proprietary systems, and software purchases—in addition to legal analysis and training efforts.

The Act was not designed with local agencies in mind and is peppered with requirements that do not make sense in that context. Application of the IPA to local agencies would not only require time and staff capacity, it would also require significant financial resources that are not provided in the bill. AB 1337 clearly imposes a state mandate by requiring a new program for data management. State mandates require reimbursement to local agencies and, in this case, could total many millions of dollars just for the initial implementation, not including the ongoing support needed to sustain compliance. Application of the IPA to local agencies must be accompanied by sustainable and sufficient resources.

Section 17 of the bill asserts that no reimbursement is required by the act, suggesting that the only state-mandated activity directed by the bill is due to the adjustments to a crime or infraction. We believe the language is inappropriate and should be amended to clearly declare that the bill would establish a new mandate reimbursable under state law, as the bill clearly mandates a new activity by local agencies: compliance with the IPA, which requires significant changes to software, internal practices, and duties of local agency workforces.

[2] California Welfare & Institutions Code § 827 et seq. (child welfare); 42 C.F.R. Part 2 (behavioral health); Lanterman-Petris-Short Act (behavioral health).

To add to these challenges, the bill allows state and local agencies little time to prepare for compliance. Because the bill would take effect January 1, 2026, and because state and local agencies may not know if the bill will become law until the Governor's October 12, 2025, deadline to sign or veto bills, state and local agencies could have fewer than three months to prepare for compliance with the IPA. Agencies would be left with just a few months to complete legal review, train staff, update forms, and implement new procedures for data management.

For the reasons above, we must respectfully oppose AB 1337 and urge your "no" vote.

Sincerely,

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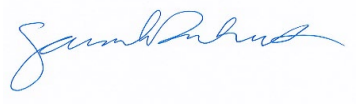

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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Senate Judiciary Committee

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 25, 2025

The Honorable Jesse Gabriel
Chair, Assembly Committee on Budget
1021 O Street, Suite 8230
Sacramento, California, 95814

RE: Housing Budget Trailer Bill (SB 130, Senate Budget and Fiscal Review Committee) As amended on June 24, 2025 – Notice of Support

Dear Assemblymember Gabriel,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of the CEQA reform and voluntary Vehicle Miles Traveled (VMT) mitigation banking program as outlined in SB 130.

First, we support the inclusion of provisions to exempt environmentally friendly housing projects from the California Environmental Quality Act (CEQA) when they comply with local requirements. CSAC recognizes the need for affordable housing that is accessible and available to meet the needs of California residents at all income levels and in all geographic areas. This important statute will expedite the development of much-needed housing while ensuring environmental sustainability. The CEQA reforms in this bill, which were part of AB 609 (Wicks), provide a pragmatic solution to addressing the state's housing crisis by streamlining the approval process for housing developments that adhere to local zoning regulations and standards, reducing unnecessary redundancy while maintaining environmental oversight. Additionally, this approach appropriately recognizes that not all housing projects have the same environmental impact. Infill housing near jobs, schools, and public transit significantly reduces greenhouse gas emissions, making communities more resilient and accessible. By removing CEQA barriers for projects in infill locations that are not environmentally sensitive or hazardous, AB 130 strikes a critical balance between housing expansion and environmental stewardship. This bill's language will help make homeownership more accessible, reduce homelessness, and build a sustainable future for our communities.

Additionally, the proposed VMT mitigation banking program is an innovative and flexible approach that offers a practical, cost-effective solution to meet CEQA transportation mitigation requirements while advancing California's critical goals for affordable housing,

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

infrastructure development, and climate resilience. By allowing developers to contribute to a centralized mitigation bank, the program streamlines compliance, reduces project delays, and ensures that mitigation investments deliver long-term environmental and community benefits.

We are particularly encouraged by the program's emphasis on:

- Affordable housing development near jobs and transit, which reduces VMT and supports walkable, connected communities;
- Infrastructure investments that unlock constrained sites and encourage infill development;
- Active transportation improvements that enhance safety, mobility, and access for all Californians;

The VMT mitigation proposal builds on successful local models and offers a scalable, statewide framework that maintains environmental protections on transportation projects while providing much-needed flexibility for developers and local governments. It is a smart, forward-looking approach that aligns with California's climate, housing, and equity priorities.

We urge your support for this important legislation and stand ready to work with you to ensure its successful implementation. Should you have any questions regarding our position, please do not hesitate to contact me at mneuburger@counties.org.

Sincerely,

Mark Neuburger
Legislative Advocate
CSAC

CC : The Honorable Robert Rivas, Speaker, California State Assembly
Honorable Members and Consultants, Assembly Committee on Budget
Jason Sisney, Budget Director, Office of Assembly Speaker Robert Rivas
Christian Griffith, Chief Consultant, Assembly Budget Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus
Gabriel Petek, Legislative Analyst, Legislative Analyst's Office
Carolyn Chu, Chief Deputy Legislative Analyst, Legislative Analyst's Office

June 17, 2025

The Honorable Ash Kalra
Chair, Assembly Judiciary Committee
1020 N St, Room 104
Sacramento, CA 95814

RE: Senate Bill 303 (Smallwood-Cuevas) – SUPPORT
As Amended May 1, 2025

Dear Chair Kalra,

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Urban Counties of California (UCC), we are pleased to support Senate Bill 303 (Smallwood-Cuevas), which protects the confidentiality of personal reflections shared during bias mitigation training. This bill ensures that if a public employee shares or acknowledges personal bias as part of required training, that information cannot be used against them in civil or administrative legal actions.

SB 303 encourages open and honest participation in training by making sure employees can reflect without fear of legal consequences. At the same time, the bill still allows evidence of actual misconduct—like discrimination or harassment—to be used when necessary.

For these reasons, RCRC, CSAC and UCC respectfully request your "Aye" vote when this bill is heard before your committee. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org

Eric Lawyer
Legislative Advocate
CSAC
elawyer@counties.org

Jean Kinney Hurst
Legislative Advocate
UCC
jkh@hbeadvocacy.com

cc: The Honorable Lola Smallwood-Cuevas, Member of the California State Senate
Members of the Assembly Judiciary Committee
Alison Merrilees, Chief Counsel, Assembly Judiciary Committee
Daryl Thomas, Consultant, Assembly Republican Caucus

June 27, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1020 N Street, Suite 8220
Sacramento, CA 95814

RE: SB 454 (McNerney) State Water Resources Control Board: PFAS Mitigation Program.
As amended on May 23, 2025 – Notice of SUPPORT
To be heard in the Assembly Committee on Appropriations on July 2, 2025

Dear Chair Wicks,

The California State Association of Counties (CSAC) and California Association of Environmental Health Administrators (CAEHA) write in **support** of SB 454 (McNerney), which would create the PFAS Mitigation Fund in the State Treasury to be used by the State Water Resources Control Board (State Water Board) to cover or reduce the costs of treating per- and polyfluoroalkyl substances (PFAS) in drinking water and wastewater.

According to studies by the National Institute of Environmental Health Sciences (NIEHS), the persistence and bioaccumulation of PFAS chemicals in the environment poses an array of health risks including increased risk of certain cancers, liver damage, immunotoxicity, and more. The Center for Disease Control (CDC) has found that PFAS impacts most of the population, with reports of PFAS found in the blood of 97% of Americans. Therefore, it is critical that PFAS exposure be mitigated to limit impacts on population health.

While some larger water municipalities have been able to implement mitigation strategies on their own, a lack of state funding leaves small and disadvantaged communities more vulnerable to the impacts of PFAS exposure. SB 454 would create a dedicated fund to address PFAS mitigation and allow the State Water Board to provide grants, loans, contracts,

or technical assistance services to water or sewer system providers to cover or reduce the costs associated with treating drinking water to meet state and federal standards.

For these reasons, CSAC and CAEHA are pleased to **support** SB 454. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org or Amanda Bloom (CAEHA) at anbloom@anbloominc.com.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association
of Counties

Amanda Bloom, MPH
Executive Director
California Association of Environmental Health
Administrators

CC : The Honorable Jerry McNerney, Member of the California State Senate

June 11, 2025

The Honorable Juan Carrillo
Chair, Assembly Local Government Committee
1021 O Street, Suite 5610
Sacramento, CA 95814

RE: SB 485 (Reyes) – Appointment of County Public Defender
As amended 4/7/2025 – Oppose Unless Amended
Set for hearing 6/18/2025 – Assembly Local Government Committee

Dear Chair Carrillo:

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we write to respectfully express our joint opposition to SB 485, unless amended to include provisions that offer essential checks and balances regarding the appointment and removal of board of supervisors-appointed county public defenders. This measure awaits hearing before the Assembly Local Government Committee.

SB 485 proposes to change the public defender's employment status from at-will to one in which removal may only occur by a majority vote of the local board of supervisors and only for neglect of duty, malfeasance, misconduct in office, or other good cause. While we understand and respect the underlying objective to ensure independence in this important role, we believe the bill, as currently written, lacks key structural safeguards. Our request for amendments is rooted in principles of good governance, organizational consistency, and process clarity – standards that we would be seeking to accompany statutory changes in the employment status for any appointed county department head.

Specifically, CSAC, UCC, and RCRC are respectfully requesting amendments that would:

- Establish a defined term of office such as the four-year term outlined in Government Code section 27640 for county counsel; and
- Set forth a clear process for judicial review should a public defender contest their removal from office.

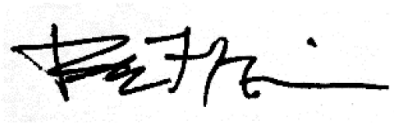
CSAC, UCC, and RCRC are concerned about the long-term implications of a perpetual appointment if it is not paired with routine performance oversight or a structured review process. These additional elements are needed to ensure that all department heads are held to the same standards to meet their various responsibilities adequately. Public accountability is an essential element of county governance, and it is both reasonable and prudent to provide clear procedures in the event of a contested termination.

As organizations representing California's elected county supervisors, we urge the committee's consideration of these amendments, which seek to (1) ensure appropriate governance safeguards and (2) maintain comparability across appointed county leadership positions. If this measure were enacted without these amendments, the public defender's employment status would be an outlier in the broader county organizational framework for non-elected department heads.

Finally, we want to underscore that our proposed changes are not intended to – and would not in practice – interfere with a public defender's constitutional obligation to provide clients with ethical and competent legal representation. We appreciate your committee's consideration of the county associations' requested amendments and welcome the opportunity to discuss further.

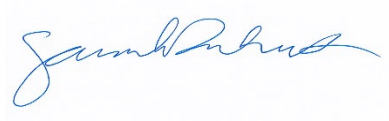
Please feel free to contact Ryan Morimune at CSAC (rmorimune@counties.org), Elizabeth Espinosa at UCC (ehe@hbeadvocacy.com), or Sarah Dukett at RCRC (sdukett@rcrcnet.org) for any questions on our associations' perspectives. Thank you.

Sincerely,



Ryan Morimune
Senior Legislative Representative
CSAC

Elizabeth Espinosa
Legislative Representative
UCC



Sarah Dukett
Policy Advocate
RCRC

Cc: The Honorable Eloise Gómez Reyes, Member of the Assembly
Members and Consultants, Assembly Local Government Committee

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 23, 2025

The Honorable Rhodesia Ransom
Chair, Assembly Emergency Management Committee
1021O Street, Room 360B
Sacramento, CA 95814

RE: SB 616 (Rubio): Community Hardening Commission: Wildfire Mitigation Program.
As Introduced on February 20, 2025
Notice of SUPPORT with Suggested Amendments
To be heard in the Assembly Emergency Management Committee on June 30, 2025

Dear Chair Ransom,

On behalf of the California State Association of Counties (CSAC), representing all 58 California Counties, I write to support SB 616 (Rubio) with a suggested amendment. SB 616 would create an independent Community Hardening Commission within the Department of Insurance, with the goals of developing a unified and centralized fire mitigation standard for all levels of government across the state, as well as generating guidelines to enable the creation of a wildfire data sharing platform. We endorse this approach and respectfully recommend that the Commission and the advisory body include at least one county representative from a distressed area, to be selected by the county statewide association.

In recent years, California has experienced an increasing frequency and intensity of disasters, including wildfires, droughts, floods, and public health emergencies. Each disaster disrupts entire communities, often exceeding the response capacity of local jurisdictions. California's counties have learned difficult lessons from these crises, including the devastating 2025 Los Angeles County Wildfires, which further underscores the urgency of streamlining rebuilding efforts.

Counties play a critical role in disaster preparedness, response, and recovery. Local governments are often the first to respond, triggering state and federal aid while leading long-term rebuilding efforts. With 58 counties varying in geography, demographics, and resources, emergency management and homeland security policies must be flexible and adaptable to meet the distinct needs, risks, and capacities of each county.

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths Inyo County	Susan Ellenberg Santa Clara County	Luis Alejo Monterey County	Bruce Gibson San Luis Obispo County	Graham Knaus

Senate Bill 616 is an important step toward the hardening of communities and homes, and helping insurance become more accessible and affordable in California. Climate change is making wildfires more frequent and destructive. As homeowners and communities work to harden their properties to make them more resilient to wildfires, there is a need for greater coordination across local, state and federal government in ways that include the perspectives of leaders across the fire science, construction, planning, insurance, and emergency response disciplines.

SB 616 will create an independent community hardening commission within the Department of Insurance. The Commission will be tasked with bringing together state and local governmental entities, as well as experts and stakeholders, to create consistent, data-driven standards to guide statewide fire mitigation policies and programs across state and local agencies. Effective fire mitigation is critically important to help improve availability and affordability of property insurance.

Equally important, in the event of future wildfire catastrophes, the Commission will be tasked with conducting post-catastrophe reports. These reports will include an assessment of available data and information about the effectiveness of hardening measures in place, a review of lessons learned on the performance of mitigation standards, and recommendations on improvements that can reduce the severity of future events.

In response to county concerns on insurance, CSAC convened the 2024 Insurance Working Group to focus on the growing challenges homeowners face in securing wildfire insurance. The working group identified four key principles to streamline access to affordable insurance: (1) rewarding resilience & risk mitigation work; (2) transparency & education; (3) adequate departmental resources & staffing; and, (4) federal engagement. CSAC endorses actions that continue to tie home hardening to insurance rates. California regulations require insurers to take into consideration a policyholder's wildfire mitigation efforts. While counties invest in risk reduction, these efforts are not reflected in the cost and availability of insurance coverage. CSAC calls for clear state mitigation standards and greater transparency on how these measures impact the availability and affordability of insurance policies.

For these reasons we support SB 616 with suggested amendments. Should you have any questions regarding our position, please contact me at cfreeman@counties.org.

Sincerely,

Catherine Freeman

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

Senior Legislative Advocate, CSAC

CC : The Honorable Susan Rubio, California State Senate, District 22

CSAC Officers

President
Jeff Griffiths
Inyo County

1st Vice President
Susan Ellenberg
Santa Clara County

2nd Vice President
Luis Alejo
Monterey County

Past President
Bruce Gibson
San Luis Obispo County

CEO
Graham Knaus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

June 25, 2025

The Honorable Gavin Newsom
Governor, State of California
1021 O Street, Suite 9000
Sacramento, California, 95814

RE: Housing Budget Trailer Bills (AB 130, Committee on Budget and SB 130, Committee on Budget and Fiscal Review)
As amended on June 24, 2025 – Notice of Support

Dear Governor Newsom,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of the CEQA reform and voluntary Vehicle Miles Traveled (VMT) mitigation banking program as outlined in AB and SB130.

First, we support the inclusion of provisions to exempt environmentally friendly housing projects from the California Environmental Quality Act (CEQA) when they comply with local requirements. CSAC recognizes the need for affordable housing that is accessible and available to meet the needs of California residents at all income levels and in all geographic areas. This important statute will expedite the development of much-needed housing while ensuring environmental sustainability. The CEQA reforms in this bill, which were part of AB 609 (Wicks), provide a pragmatic solution to addressing the state's housing crisis by streamlining the approval process for housing developments that adhere to local zoning regulations and standards, reducing unnecessary redundancy while maintaining environmental oversight. Additionally, this approach appropriately recognizes that not all housing projects have the same environmental impact. Infill housing near jobs, schools, and public transit significantly reduces greenhouse gas emissions, making communities more resilient and accessible. By removing CEQA barriers for projects in infill locations that are not environmentally sensitive or hazardous, AB 130 strikes a critical balance between housing expansion and environmental stewardship. This bill's language will help make homeownership more accessible, reduce homelessness, and build a sustainable future for our communities.

Additionally, the proposed VMT mitigation banking program is an innovative and flexible approach that offers a practical, cost-effective solution to meet CEQA transportation mitigation requirements while advancing California's critical goals for affordable housing, infrastructure development, and climate resilience. By allowing developers to contribute to a centralized mitigation bank, the program streamlines compliance, reduces project delays, and ensures that mitigation investments deliver long-term environmental and community benefits.

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

We are particularly encouraged by the program's emphasis on:

- Affordable housing development near jobs and transit, which reduces VMT and supports walkable, connected communities;
- Infrastructure investments that unlock constrained sites and encourage infill development;
- Active transportation improvements that enhance safety, mobility, and access for all Californians;

The VMT mitigation proposal builds on successful local models and offers a scalable, statewide framework that maintains environmental protections on transportation projects while providing much-needed flexibility for developers and local governments. It is a smart, forward-looking approach that aligns with California's climate, housing, and equity priorities.

We urge your support for this important legislation and stand ready to work with you to ensure its successful implementation. Should you have any questions regarding our position, please do not hesitate to contact me at mneuburger@counties.org.

Respectfully,

Mark Neuburger
Legislative Advocate
CSAC

CC : Nathan Barankin, Chief of Staff, Office of the Governor
Jamie Callahan, Deputy Chief of Staff, Office of the Governor
Christine Aurre, Legislative Affairs Secretary, Office of the Governor
Nani Coloretti, Cabinet Secretary, Office of the Governor
Joe Stephenshaw, Director, California Department of Finance
Erika Li, Chief Deputy Director of Budgets, California Department of Finance

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 1, 2025

The Honorable Jesse Arreguín, Chair
Senate Human Services Committee
1020 N Street, Room 521
Sacramento, CA 95814

RE: AB 607 (Rodriguez) CalWORKs: Home Visting Program.
As Introduced on February 13, 2025 – SUPPORT

Dear Senator Arreguín:

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of Assembly Bill 607 by Assembly Member Celeste Rodriguez. This measure would extend the enrollment timeframe for the CalWORKs Home Visiting Program (HVP) from a child under 24 months to a child under 36 months and would extend the amount of time that families can participate in the program.

CalWORKs HVP is a voluntary program supervised by the California Department of Social Services (CDSS) and administered by participating counties. Currently, 41 out of 58 counties administer CalWORKs HVP, which matches trained professionals with expecting and new parents to assist with the early development of their children. HVPs follow evidence-based models that provide positive health development and well-being for low-income families that expand future educational, economic, and financial outcomes and improve the likelihood that they will exit poverty.

While HVP models managed by the California Department of Public Health (CDPH) through the California Home Visiting Program (CHVP) allow families to remain in a program through a HVP's recommended duration, CalWORKs HVP can only be offered to families for 24 months or until a child reaches their second birthday. AB 607 would align the CalWORKs HVP participation timeline with CHVP participation timelines and allow families participating in CalWORKs HVP models to participate in programs for the full duration, maximizing the health and development benefits for vulnerable families.

For these reasons, CSAC supports Assembly Bill 607. Should you have any questions regarding our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org.

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Sincerely,

Justin Garrett
Senior Legislative Advocate

cc: The Honorable Celeste Rodriguez
Honorable Members and Consultants, Senate Human Services Committee

June 30, 2025

The Honorable Steve Padilla
Chair, Senate Governmental Organization Committee
1020 N Street, 584
Sacramento, CA 95814

RE: AB 696 (Rhodesia Ransom) Lithium-ion vehicle batteries: emergencies: advisory group.
As amended on May 23, 2025 – Notice of SUPPORT
To be heard in the Senate Governmental Organization Committee on July 8, 2025

Dear Chair Padilla,

The California State Association of Counties (CSAC) and California Association of Environmental Health Administrators (CAEHA) write in **support** of AB 696 (Rhodesia Ransom), which would require the Director of the Governor's Office of Emergency Services (Cal-OES) to convene the Lithium-Ion Car Battery Advisory Group to review, and advise the Legislature on, policies pertaining to the safety and management of lithium-ion vehicle batteries involved in emergency situations to develop best practice standards for first responders to use when responding to lithium-ion vehicle battery related emergencies.

Lithium-ion batteries are widely used in zero emission vehicles (ZEVs) and in the first quarter of 2024, nearly 24% of all new cars sold in California were ZEVs. According to studies by the National Transportation Safety Board (NTSB), lithium-ion vehicle batteries can pose major safety risks to first responders, including electric shock and thermal runaway, an uncontrollable increase in temperature causing fires and explosions. Batteries can be ejected from a battery pack or casing during an incident, which can spread the fire or cause a cascading incident with secondary ignitions. Even after extinguishing a lithium-ion battery fire, there is a risk of re-ignition. Therefore, firefighters need to adopt strategic cooling methods to manage these incidents effectively.

To inform critical actions such as safe and effective rescue and vehicle extrication, firefighters and other first responders should get Emergency Response Guides from original equipment manufacturers (OEMs). However, OEMs provide limited guidance for first and second responders, leading to gaps in safety standards. AB 696 would require the Director of Cal-OES to convene the Advisory Group no later than December 31, 2026, and require the

Advisory Group to develop standards based on existing local, state, and national guidance and research on or before July 1, 2028.

For these reasons, CSAC and CAEHA are pleased to **support** AB 696. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org or Amanda Bloom (CAEHA) at anbloom@anbloominc.com.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association
of Counties

Amanda Bloom, MPH
Executive Director
California Association of Environmental Health
Administrators

CC : The Honorable Rhodesia Ransom, Member of the California State Assembly

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 1, 2025

The Honorable Steve Padilla
Chair, Senate Governmental Organization Committee
1020 N Street, Room 584
Sacramento, CA 95814

RE: AB 1285 (Committee on Emergency Management) State Fire Marshal: lithium-ion battery facilities: guidance
As Introduced on February 21, 2025 – Notice of SUPPORT

Dear Chair Padilla,

On behalf of the California State Association of Counties, we write in support of AB 1285 (Committee on Emergency Management) which would require the creation of management strategies by state agencies targeted at utility grade lithium-ion battery storage facilities and fire prevention.

As the state embarks on achieving clean energy milestones, it is critical that emergency management tactics evolve to handle emerging technology in renewable energy. Battery storage facilities are increasingly being utilized to meet clean energy targets, but recent fire incidents have caused growing alarm for communities. CSAC advocates for robust energy storage solutions that align with the state's clean energy goals. This includes sharing timely and accurate information with local emergency managers and public safety agencies regarding incidents as AB 1285 would require.

Emergency management policies must be flexible and adaptable to the distinct needs of each county. Counties support operator-funded and maintained fire suppression systems, and other appropriate safety mechanisms, for battery facilities of all sizes. To protect communities from future disasters, CSAC supports strategies that strengthen community resilience.

For these reasons, CSAC is in support of AB 1285, a critical step in protecting the state from disasters. Should you have questions, please contact me at cfreeman@counties.org.

Sincerely,

Catherine Freeman
Senior Legislative Advocate, CSAC

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

July 2, 2025

The Honorable Sasha Renée Pérez, Chair
Senate Education Committee
1021 O Street, Room 6740
Sacramento, CA 95814

RE: AB 1400 (Soria) Community colleges: Baccalaureate Degree in Nursing Pilot Program.
As Amended March 24, 2025 – SUPPORT
Set for hearing on July 9, 2025

Dear Senator Pérez,

On behalf of the California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and Urban Counties of California (UCC), we write in support of Assembly Bill 1400 by Assembly Member Esmeralda Soria. This measure would require the Chancellor of the California Community Colleges to develop a pilot program to allow up to 15 community college districts to offer a Bachelor of Science in Nursing degree.

The shortage of health professionals in California, and particularly in rural areas of the state, has been a persistent concern for many years, and has become more acute in recent years due to the COVID-19 pandemic and the aging of the health care workforce. Rural areas with smaller populations that are farther from urban centers often have the lowest supply of health professionals per capita. Further, rural California does not have a high concentration of the four-year universities needed for graduate degree health professionals; however, often these communities have access to community college programs. However, problems are not isolated to rural areas. The Inland Empire and the Central Valley are two of the fastest growing regions in California, and they are the two areas that have the lowest per capita health workforce. It's also a challenge to recruit and retain people in the Central Valley and Inland Empire that reflect the diversity and language capabilities of these regions.

A study released in 2023 by the Healthforce Center at the University of California, San Francisco, which examines the healthcare workforce landscape in rural and the County Medical Services program (CMSP) counties, found that the Imperial Valley (Imperial), North Central region (Butte, Colusa, Glenn, Tehama), and the San Joaquin Valley (Kings, Madera, Merced, Tulare) sub-regions have the lowest ratios of RNs per capita in the state. Statewide estimates show California faces a shortage of about 36,000 licensed nurses.

California's current healthcare workforce development apparatus is not equipped to handle the growing nursing needs of the state, especially in disadvantaged communities and in rural parts of the state. While California's Community College system does offer associate degrees in nursing, the needs of the healthcare workforce more frequently demand a bachelor's degree. This level of degree is exclusive in California to private institutions that are prohibitively expensive, or to the University of California and the California State University systems which have limited capacity and difficulty serving areas of the state with the highest need.

In order to meet our nursing workforce needs and extend these career opportunities to Californians throughout the state, we must expand the role of our community college system. AB 1400 will take the first step in this process by allowing a limited number of community college districts to expand their nursing programs to offer a Bachelor of Science in Nursing degree. This will expand the access and affordability of these degrees and will demonstrate how these offerings might be further expanded to additional community college districts.

For these reasons, our organizations are pleased to support AB 1400, and respectfully request your "Aye" vote when this measure is heard before your committee. Please do not hesitate to reach out with any questions.

Sincerely,

Jolie Onodera
Senior Legislative Advocate
California State Association of Counties
jonodera@counties.org
916-591-5308

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org
916-447-4806

Kelly Brooks-Lindsey
Legislative Advocate
Urban Counties of California
kbl@hbeadvocacy.com
916-753-0844

cc: The Honorable Esmeralda Soria, California State Assembly
Honorable Members and Consultants, Senate Education Committee

June 30, 2025

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Privacy and Consumer Protection Committee
1020 N Street, Room 162
Sacramento, CA 95814

Re: **SB 7 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended June 19, 2025)*

Dear Assembly Member Bauer-Kahan:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, and Association of California Healthcare Districts, write in respectful opposition to Senate Bill (SB) 7, which would complicate the routine work of local governments without a clear need.

SB 7 May Widely Apply to Many Technologies
We understand the reasonable concerns about the slow creep of new technologies into daily life. However, the scope of this bill is vast and would deem banal tools used for everyday work to be Automated Decision Systems (ADS) whose use could be covered by this bill. Given the bill's broad scope, the burdens from compliance with its notification and appeal requirements are significant.

SB 7 is an Unfunded Mandate on Local Budgets
The initial and ongoing reporting obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. The same is true of the requirements around human review and a mandatory appeals process. Some small agencies may struggle to comply with the bill's requirements concerning review and appeals. The bill's enforcement provisions expose local governments to increased litigation risk and costs. These constitute unfunded mandates on public employers without a clear need.

Applying SB 7 to Public Employers May Lead to Unintended Consequences
Local governments are responsible for operating and securing critical infrastructure, jails, hospitals, and police and fire departments. It is not difficult to envision scenarios where the requirements of SB 7 would impede local government operations. For example, as the definitions are sweeping, health care providers using ADS for basic functions such as scheduling, billing, clinical recommendations and workplace safety initiatives, would be severely limited in doing so. This significant shift will lead to increased costs to public health care providers and create disparate outcomes across patients and providers, without a meaningful reason to do so. In addition, many counties rely on ADS to manage the daily scheduling and operations of public safety personnel. Meeting the requirements of this bill may prove challenging—particularly given the current timelines, the complexity of overlapping laws, and the potential need for costly system modifications. These challenges could place a significant strain on already limited county budgets. As a result, counties may be forced to temporarily rely on alternative—and potentially less efficient—methods to carry out routine tasks while working toward full compliance.

For public employers with represented workforces, use of technology tools is often bargained between employees and public employers based on local conditions, security needs, and the concerns of the public workforce. State law already prohibits public employers from using workplace technology tools like ADS to deter or discourage union membership. Specifically, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Put simply, for public employers, the burdens potentially imposed by this bill exceed any need. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, our organization must respectfully oppose SB 7. Please feel free to contact us at any time with questions or to further discuss our position.

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
aarona@csda.net

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties
ejungwirth@counties.org

Jean Kinney Hurst
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

Sarah Bridge
VP, Advocacy & Strategy
Association of California
Healthcare Districts
sarah.bridge@achd.org

CC: The Honorable Jerry McNerney
Members, Assembly Privacy and Consumer Protection Committee
Josh Tosney, Chief Consultant, Assembly Privacy and Consumer Protection Committee
Lauren Prichard, Consultant, Assembly Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 1, 2025

The Honorable Matt Haney
Chair, California State Assembly
1021 N St. Room 156
Sacramento, CA 95814

RE: SB 340 (Laird) General plans: housing element: emergency shelter.
As amended on March 17, 2025 – Notice of Support
To be heard in the Assembly Housing Committee on 7/2/2025

Dear Chair Haney,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of SB 340. Specifically, we support this bill's efforts to clarify and strengthen the provisions related to emergency shelter services in zones where shelters are a use by right. This bill is a crucial step towards ensuring that emergency shelters can operate without unnecessary barriers, thereby providing essential services to our most vulnerable residents.

Under current law, specific areas have zoning designations where emergency shelters are a use by right. However, despite these provisions, many shelter providers continue to face obstacles that hinder their ability to offer comprehensive services. Senate Bill 340 addresses these issues by clarifying that all services offered by an emergency shelter, as well as any expansion of services, are included in the by-right approval for shelters in designated zones.

Emergency shelters play a vital role in addressing the immediate housing needs of individuals experiencing homelessness. The services they provide, such as housing navigation, case management, outreach, and access to basic needs like meals, showers, laundry, mail services, and health care, are integral to helping individuals transition from homelessness to stable housing. By removing the requirement for conditional use permits or other discretionary permits for these services, Senate Bill 340 ensures that shelters can operate more efficiently and effectively.

The intent of the original law was to support the production of interim housing solutions and ensure that every jurisdiction provides barrier-free opportunities for the development

CSAC Officers | **President** Jeff Griffiths, Inyo County | **1st Vice President** Susan Ellenberg, Santa Clara County | **2nd Vice President** Luis Alejo, Monterey County | **Past President** Bruce Gibson, San Luis Obispo County | **CEO** Graham Knaus

of shelters. Senate Bill 340 reinforces this intent by closing loopholes and preventing jurisdictions from imposing additional hurdles on shelter providers. This bill is sponsored by the Public Interest Law Project, which underscores its importance and the broad support it has garnered from advocates for the homeless.

To make meaningful progress in helping those who are unhoused, CSAC developed the 'AT HOME' Plan. The six-pillar plan (Accountability, Transparency, Housing, Outreach, Mitigation, and Economic Opportunity) is designed to make true progress to effectively address homelessness at every level - state, local and federal. Through the AT-HOME Plan, CSAC is working to identify the policy changes needed to build a homelessness system that is effective and accountable including specific recommendations related to prevention, housing, the unsheltered response system, and sustainable funding. SB 340 aligns with our AT HOME efforts, specifically as it relates to the shelter portion of the Housing pillar.

For these reasons, CSAC supports SB 340 and respectfully requests your AYE vote. Should you have any questions regarding our position, please do not hesitate to contact me at mneuburger@counties.org.

Sincerely,

Mark Neuburger
Legislative Advocate, CSAC

CC : The Office of the Honorable John Laird
Members, California State Assembly Committee on Housing
Lisa Engel, Chief Consultant, Assembly Committee on Housing

July 2, 2025

The Honorable Lola Smallwood-Cuevas
California State Senate
1021 O Street, Suite 6530
Sacramento, CA 95814

Re: **SB 464 (Smallwood-Cuevas) Employer pay data**
As amended May 1, 2025 – REMOVE OPPOSITION

Dear Senator Smallwood-Cuevas,

On behalf of the California State Association of Counties (CSAC), League of California Cities (Cal Cities), California Special Districts Association (CSDA), Urban Counties of California (UCC) and Rural County Representatives of California (RCRC), we are writing to share that we are removing our opposition to your Senate Bill 464. Our associations are appreciative that county concerns have been addressed based on the unpublished amendments. We thank you for your attention and leadership on the issue.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Johnnie Pina
Legislative Advocate
League of California Cities
jpina@calcities.org

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
jkh@hbeadvocacy.com

CC: The Honorable Lola Smallwood-Cuevas, California State Senate
Members and Consultants, Assembly Judiciary Committee
Alison Merrilees, Chief Counsel, Assembly Judiciary Committee
Darryl Thomas, Consultant, Assembly Republican Caucus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 1, 2025

The Honorable Isaac Bryan
Chair, Assembly Natural Resources Committee
1020 N St, Room 164
Sacramento, CA 95814

RE: SB 615 (Allen) Vehicle traction batteries.
As revised on June 18, 2025 – Notice of SUPPORT
To be heard in the Assembly Committee on Natural Resources on July 7, 2025

Dear Chair Bryan,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in **support** of SB 615 (Allen), which would make manufacturers responsible for the end-of-life (EOL) management of vehicle traction batteries.

As an early driver and adopter of zero emission vehicle (ZEV) technology, California is also at the forefront of dealing with the EOL management of electric vehicle (EV) batteries. In California, all batteries are considered hazardous waste at EOL. However, batteries are inherently valuable as they contain critical earth minerals that can be recycled and reused. If batteries are not handled properly at EOL, they also pose a potential environmental health and public safety hazard.

Batteries that are still under warranty are typically returned to the original equipment manufacturer (OEM) for repair or replacement, but if EV batteries are outside of their warranty, OEMS are not required to take them back. Therefore, a coherent state policy must be designed to ensure all vehicle traction batteries are reused, repaired, repurposed, remanufactured, and recycled.

SB 615 would require a battery supplier to be responsible for ensuring the proper EOL management of a vehicle traction battery if it is removed from a vehicle that is still in service, or if the vehicle traction battery is offered or returned to its battery supplier. SB 615 would also require reporting to the Department of Toxic Substances Control regarding the sale, transfer, or receipt of a vehicle traction battery or battery module.

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

For these reasons, CSAC **supports** SB 615. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

Sincerely,

Jordan Wells
Legislative Advocate
California State Association of Counties

CC : The Honorable Ben Allen, Member of the California State Senate

July 2, 2025

The Honorable Liz Ortega
Chair, Assembly Labor and Employment Committee
1020 N Street, Room 155
Sacramento, CA 95814

RE: SB 617 (Arreguín): California Worker Adjustment and Retraining Act
As amended June 27, 2025 – SUPPORT
To be heard in the Assembly Committee on Labor and Employment July 9, 2025

Dear Assemblymember Ortega,

On behalf of the California State Association of Counites (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC), we are pleased to support SB 617, which will strengthen the Worker Adjustment and Retraining Act by increasing information in Worker Adjustment and Retraining Notifications (WARN) on dislocated worker assistance, CalFresh benefits, and promote coordination between employers and local service providers, including local workforce development boards (LWDBs).

Current state law mandates that certain employers notify stakeholders of mass layoffs, including LWDBs, 60 days before the mass layoff via WARN letters. This proposal builds upon this foundation by expanding the notification to include information about employers' plans to provide dislocated worker assistance and require notification about CalFresh benefits. Employers will be required to declare their plan to offer services and provide contact information for both a company representative and the LWDB, as well as a list of free LWDB services. This ensures affected workers have immediate access to vital support upon notification and enables LWDBs to tailor their assistance effectively. Additionally, recent amendments require inclusion of information about CalFresh benefits, including the CalFresh benefits helpline and a link to the CalFresh benefit website.

By providing this crucial information, we believe SB 617 will improve the efficacy of WARN notices and, more importantly, ease the challenging transition for displaced workers.

For these reasons, we are proud to support SB 617. Should you have any questions regarding our position, please do not hesitate to contact me at elawyer@counties.org.

Sincerely,

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
jkh@hbeadvocacy.com

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

CC: The Office of the Honorable Jesse Arreguín, California State Senate
Members and Consultants, Assembly Labor and Employment Committee
Megan Lane, Chief Consultant, Assembly Labor and Employment Committee
Lauren Prichard, Consultant, Assembly Republican Caucus

June 30, 2025

The Honorable Marc Berman, Chair
Assembly Business and Professions Committee
1021 O Street, Suite 8130
Sacramento, CA 95814

Re: **SB 777 (Richardson): Cemeteries**
As amended 6/16/25 – OPPOSE
Set for hearing 7/8/25 – Assembly Business and Professions Committee

Dear Assembly Member Berman:

On behalf of our collective memberships, our organizations – the Urban Counties of California (UCC), the California State Association of Counties (CSAC), the Rural County Representatives of California (RCRC) the California Special Districts Association (CSDA), and the League of California Cities (CalCities) – write in respectful opposition to Senate Bill 777, which would shift the responsibility for management of abandoned endowment care cemeteries from the state to local agencies. This measure, while well-intended, fails to appropriately address the underlying problems associated with endowment care cemetery regulation by the state and instead transfers the burdens of abandoned facilities to local taxpayers without adequate consideration of associated fiscal risks that will exist in perpetuity.

While we are deeply sympathetic to situations where private cemeteries have been abandoned and left vulnerable to vandalism and decay, especially for those family members whose loved ones are interred, for the most part, local governments do not currently provide cemetery services. Local public cemetery districts, where they exist, often operate with very few resources, and are not well-equipped to manage an additional facility. Where they do not exist, the LAFCO process would initiate a thorough analysis that would typically include an examination of the financial resources associated with the potential new district, as well as the liabilities associated with such a transfer. The likelihood that such an analysis would suggest that formation of a new district was the appropriate next step is small, essentially leaving the abandoned cemetery, the community, and state and local agencies in the exact same place prior to the commencement of a LAFCO hearing.

We also understand that SB 777 includes significantly increased fees on those regulated by the Cemetery and Funeral Bureau and recognize that it will take quite some time before enough fee revenue is collected by the state for there to be sufficient funds for these cemeteries to continue to be maintained. This raises numerous concerning questions: What resources are available in the meantime? How will the Bureau operationalize reimbursement for the costs associated with the LAFCO process? How will the process outlined for the first six cemeteries that are eligible for transfer be funded when we know that there are insufficient resources for such a transfer? SB 777

assumes that these issues will be resolved without additional statutory or budget direction; local agencies, however, know that the unresolved issues associated with funding new responsibilities usually results in local agencies dealing with the associated public fallout and fiscal perils.

SB 777 also raises the fundamental concern that the state is simply transferring its own liabilities to a local agency and perhaps even *incentivizing* a private entity to abandon its property and liabilities without consequence. There is nothing in the bill that would require that the transfer of an abandoned endowment care cemetery be the last resort for the Bureau's resolution of its ongoing management. Further, there appears to be no penalty or other liability for an owner that abandons their property. We understand that it is the author's intent for the transfer to a local agency to be a last resort but argue that this is a potential result of the current structure of the bill.

Just like the state, local agencies are facing serious fiscal constraints that are forecasted to only worsen as the months progress. While we appreciate efforts to ensure that there are some resources available to manage these facilities, we assert that the process laid out in SB 777 has some significant flaws, particularly when we consider that such a transfer of ownership means that local taxpayers are responsible for an abandoned endowment care cemetery forever. These costs are significant and include burial services, deferred maintenance, security, and new liabilities.

We respectfully urge that a more deliberative discussion with all stakeholders about how to address the state's challenges with managing these cemeteries is in order rather than approval of this measure. As a result, we remain opposed to SB 777.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

Sarah Dukett
Senior Policy Advocate
Rural County Representatives of California

Marcus Detwiler
Legislative Representative
California Special Districts Association

Brady Guertin
Legislative Advocate
League of California Cities

cc: Members and Consultants, Assembly Business and Professions Committee
The Honorable Laura Richardson, California State Senate

July 9, 2025

The Honorable Aisha Wahab
Chair, Senate Housing Committee
1021 O Street, Room 3330
Sacramento, CA 95814

RE: AB 36 (Soria) Housing elements: prohousing designation
As amended on March 19, 2025 – Notice of Support

Dear Chair Wahab,

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and the League of California Cities (Cal Cities), we write in support of AB 36. We strongly support this bill's integration of the application for the Prohousing Designation Program (PDP) with the housing element update cycle to help small prohousing local governments with limited resources better qualify for state housing and infrastructure programs.

AB 36 directs the Department of Housing and Community Development (HCD) to use the information cities with populations under 50,000 persons and counties under 200,000 already provide in their housing elements to determine their eligibility for the PDP. Additionally, the bill extends the time until prohousing designations expire for an additional two years.

The PDP designates local governments going above and beyond the requirements of state housing law to promote housing development in their communities as "prohousing", rewarding them with priority access to critical housing and infrastructure programs. However, the application for the PDP is complex and requires extensive documentation, making it difficult for rural jurisdictions with limited staff to apply even when they have adopted strong prohousing policies. AB 36 eases the administrative burden on smaller cities and counties by having HCD analyze the information local governments already provide in their housing elements to determine whether they qualify as prohousing. This minimizes unnecessary duplication of work by local governments with limited resources

without lowering the standards to be designated as prohousing. To combat California's housing crisis, we must equitably recognize and incentivize the work local governments of all sizes are doing to promote housing development. This bill achieves our mutual goal of focusing HCD's resources to assist local governments' efforts to meet the state's housing needs.

For these reasons, we are proud to support AB 36 and respectfully requests your AYE vote. Should you have any questions regarding our position, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties

Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California

Brady Guertin
Legislative Advocate
League of California Cities

CC: The Honorable Esmerelda Soria, Member of the California State Assembly
Members and staff, Senate Housing Committee
Alison Hughes, Chief Consultant, Senate Housing Committee
Kerry Yoshida, Policy Consultant, Senate Republican Caucus

July 7, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: AB 283 (Haney) – IHSS Employer-Employee Relations Act
As Amended on June 12, 2025 – Support if Amended
Set for hearing July 14, 2025

Dear Chair Caballero:

On behalf of the California State Association of Counties (CSAC) and the County Welfare Directors Association of California (CWDA), we are writing to share our Support if Amended position on AB 283 authored by Assembly Member Matt Haney. This legislation would transition collective bargaining for the In-Home Supportive Services (IHSS) program from counties to the state.

The IHSS program serves roughly 840,000 consumers in California and allows qualified aged, blind, or disabled persons to receive supportive services from a provider to help them live at home. IHSS services are delivered by roughly 750,000 providers. Counties have proudly partnered with the state on the IHSS program since it was realigned in 1991 and are committed to the success of this program, which has helped reduce care costs and improve the well-being of individuals.

Existing law deems a Public Authority (PA) as the employer of record for the purposes of collective bargaining for IHSS providers. This bill establishes the IHSS Employer-Employee Relations Act, which would shift collective bargaining for IHSS providers from counties and PAs to the state. Our associations have worked closely with the author and sponsors on a series of amendments to address county and PA concerns in three key areas – (1) Providing clarity that the state would be responsible for the nonfederal share of costs for wage and benefit increases agreed to in statewide bargaining; (2) Removing county and public authority administrative functions from the scope of representation in statewide bargaining; and (3) Ensuring full funding for counties to comply with any new program requirements agreed to in statewide bargaining.

We are appreciative of the collaborative engagement in being able to reach agreement on amendments that address these issues. Key amendments in the June 12 version of the bill include:

- Removing several items from the scope of representation that are core county and public authority administrative functions (provider registry, backup provider system, provider recruitment and retention).
- Adding county and public authority representatives to the advisory committee.
- Requiring consultation with those representatives about county and public authority programmatic and fiscal implications prior to finalizing a memorandum of understanding.
- Clarifying that the bill does not change any other aspect of the IHSS employment relationship.

In addition, the author has indicated agreement on two additional amendments and it's our understanding that they will be incorporated as the bill moves forward. These amendments are:

> Amend Section 12306.16(e) of the Welfare and Institutions Code
> (e) The rebased County IHSS MOE shall only be adjusted pursuant to subdivisions (c) and (d). *The rebased County IHSS MOE shall not be adjusted based on any provision of any memorandum of understanding, or addenda, appendices, or side letters thereto, between the state and recognized employee organizations, as defined in Section 110003 of the Government Code.*
>
> Amend Section 12306.16(b)(3)(B) of the Welfare and Institutions Code
> (B) The state shall pay 100 percent of the allowable nonfederal share of county administration and public authority administration costs for each county. *The state shall also pay 100 percent of the nonfederal share of county administration and public authority administration costs for each county of any administration costs resulting from the provisions of any memorandum of understanding, or addenda, appendices, or side letters thereto, between the state and recognized employee organizations, as defined in Section 110003 of the Government Code.* Once the county's share of the appropriated General Fund moneys is exhausted, the county shall pay 100 percent of the remaining nonfederal share of county administration and public authority administration costs. Each county shall pay 100 percent of any costs for public authority administration that are in excess of the county's approved rate approved pursuant to subdivision (a) of Section 12306.1. At the end of the fiscal year, any remaining unspent General Fund moneys allocated for IHSS county administration or public authority administration shall be redistributed through a methodology determined in conjunction with the County Welfare Directors Association of California or the California Association of Public Authorities.

The above amendments will provide clarity that counties would not be responsible for the increased costs that the state agrees to in statewide bargaining, including wage and benefit increases and new program requirements. This fiscal protection language is essential as counties would have no ability to manage the associated costs of statewide bargaining within Realignment funding and county budgets.

IHSS is a vital program for older adults and people with disabilities that families rely on to care for their loved ones. CSAC and CWDA believe that with the amendments outlined in this letter, AB 283 would transition collective bargaining to the state in a manner that would maintain the consumer-driven foundation of the IHSS program, mitigate for any fiscal, legal, and administrative impacts to counties, and help attract additional quality providers to sustain the growth of the program.

If you have any questions about our position, please don't hesitate to contact us. Thank you for your consideration.

Sincerely,

Justin Garrett
Senior Legislative Advocate
California State Association of Counties
jgarrett@counties.org

Carlos Marquez III
Executive Director
County Welfare Directors Association
cmarquez@cwda.org

cc: The Honorable Matt Haney, California State Assembly
Members and Consultants, Senate Appropriations Committee

American Planning Association
California Chapter

Creating Great Communities for All

July 10, 2025

The Honorable Thomas Umberg
Chair, Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

RE: AB 299 (Gabriel) Motels, hotels, and short-term lodging: disasters.
As amended on July 3, 2025 – Notice of Support

Dear Senator Umberg,

On behalf of the California State Association of Counties (CSAC) and the California Chapter of the American Planning Association (APA), we write in support of AB 299. This bill ensures individuals displaced by a disaster, like the recent fires in Los Angeles, can access stable temporary housing at hotels, motels, and short-term rentals.

Following the Eaton and Palisades fires, thousands of Los Angeles County residents have lost their homes or been displaced. Many impacted individuals who needed immediate housing have turned to hotels, motels, and short-term rentals. While stays under 30 days do not present any legal complications, following that time frame, existing laws can make it challenging for individuals to access a stable place to stay. In practice, this can lead to lodgers needing to shuffle individuals between rooms or remove them from the property each month, which can be harmful and destabilizing.

Under AB 299, guests displaced by a disaster will be able to stay for longer than 30 days without establishing a landlord-tenant relationship, providing lodgers with the certainty needed to not shuffle individuals between rooms or remove them from the property.

California was already facing a housing and homelessness crisis before these fires began, and we must act quickly to ensure displaced individuals can access stable temporary shelter. Counties support measures that provide housing assistance to all community members. By extending critical legal assurances, AB 299 will directly help provide stability and security to those who have already been through so much.

CSAC supports efforts to comprehensively protect communities from future disasters - including wildfires, floods, extreme heat, and other climate-driven events. Additionally, CSAC supports legislation that codifies community recovery and rebuilding best practices

so that all counties that experience future disasters can utilize these laws to expedite the restoration of their communities. AB 299 aligns with these efforts and will strengthen counties' abilities to meaningfully prepare for disasters, provide effective response during the emergency, and expedite post-disaster recovery.

For these reasons, CSAC and APA support AB 299 and respectfully request your AYE vote. Should you have any questions regarding our position, please do not hesitate to contact us at mneuburger@counties.org or policy@apacalifornia.org

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties
mneuburger@counties.org

Reuben Duarte
Vice President, Policy and Legislation
APA California
policy@apacalifornia.org

Cc: The Honorable Jesse Gabriel, Member of the California State Assembly
Members and staff, Senate Judiciary Committee
Margie Estrada, Chief Counsel, Senate Judiciary Committee
Sarah Haynes, Fiscal Director, Assembly Republican Caucus

June 23, 2025
The Honorable Thomas Umberg
Chair, Senate Judiciary Committee
1021 O Street, Room 3240
Sacramento, CA 95814

RE: **AB 340 (Ahrens) Employer-Employee Relations Confidential Communications.**
OPPOSE *(As Amended March 5, 2025)*

Dear Senator Umberg,

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), the Association of California Healthcare Districts (ACHD), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Association of Joint Powers Authorities (CAJPA), Public Risk Innovation, Solutions, and Management (PRISM), the California Association of School Business Officials (CASBO), the California

Association of Recreation and Park Districts (CARPD), California County Superintendents, the School Employers Association of California (SEAC), Small School Districts' Association (SSDA), Community College League of California, Schools Excess Liability Fund (SELF), and the University of California, write in respectful opposition to Assembly Bill (AB) 340. This bill would restrict an employer's ability to conduct internal investigations to the detriment of employees' and the public's safety and well-being, adding new costs and liability for public employers. Moreover, the substantive provisions of the bill create restrictions mirroring a privilege.

Previous Legislation and Previous Veto
Our concerns with AB 340 are consistent with the issues raised in response to previously introduced legislation, AB 2421 (Low, 2024), AB 729 (Hernandez, 2013), AB 3121 (Kalra, 2018) and AB 418 (Kalra, 2019). The issues are succinctly captured in the AB 729 veto message from Governor Brown, which states: "I don't believe it is appropriate to put communications with a union agent on equal footing with communications with one's spouse, priest, physician or attorney. Moreover, this bill could compromise the ability of employers to conduct investigations into workplace safety, harassment and other allegations."

New Costs and Added Liability for the State, Local Governments, and Schools
In order to conduct proper investigations that uphold the public's trust, protect against the misuse of public funds, and ensure the safety and well-being of both public employees and the public at large, it is critical that a public employer has the ability to interview all individuals with relevant information to ascertain the facts and understand the matter fully. AB 340 would increase investigation and litigation costs for the state as well as local governments and schools by creating incomplete investigations, since all appropriate employees with relevant information cannot be questioned. Costs and risks may also increase as conduct challenged as unlawful under the bill's provisions is adjudicated before the Public Employment Relations Board (PERB). For schools, this is a drain of Proposition 98 funding.

Inconsistent with PERB Decision
AB 340 states that its prohibition on employer questioning is intended to be consistent with, and not in conflict with, William S. Hart Union High School District (2018) PERB Dec. No. 2595. This is problematic for two reasons. First, the bill is inconsistent with that PERB decision. That decision engaged in a circumstantial analysis to determine whether employer questioning was prohibited or not, while weighing the employee's and the employer's interests. AB 340 goes far beyond that, forgoing any circumstantial analysis or weighing of interests. It categorically prohibits questioning of confidential employee representative communications, except for narrow, limited exceptions. Second, we are not aware of evidence that PERB is denying the interests of employees on this issue, raising the question of whether a legislative solution is warranted.

Expansion of New One-Sided Standard
AB 340 would create a de facto prohibition on employers requesting a court to compel disclosure of purportedly confidential communications, which is the same outcome as if the communication was privileged in those circumstances. This will have a significant impact on judicial and administrative proceedings.

Endangers Workplace Safety
AB 340 interferes with the ability to interview witnesses because it would prohibit public agencies from questioning any employee or "representative of a recognized employee organization, or an exclusive representative" about communications between an employee and a "representative of a recognized employee organization, or an

exclusive representative." While AB 340 includes a narrow exception for criminal investigations, and provides that it does not supersede Gov. Code 3303, many necessary investigations are still subject to the bill's limitations, putting safety at risk.

This bill would hinder employees who wish to voluntarily report an incident or testify in front of necessary misconduct investigations since an employer would be prohibited from certain lines of questioning. It would also limit the ability of public employers to carry out the requirements of recently enacted law, Senate Bill 553 (Cortese, 2023), which includes conducting investigations into workplace safety, harassment, and other allegations. As of January 1, 2025, SB 553 allows collective bargaining representatives standing to seek temporary restraining orders (TRO) in connection with workplace violence. AB 340 will create a problematic scenario wherein a TRO may be obtained but an employer could not fully investigate the underlying facts. AB 340 lacks guardrails to prevent potential conflicts of interest that could arise during employee safety issues.

Specific to local educational agencies, TROs are being sought by teachers and classroom aides against students with a disability, who may not have full control of their motor skills or have a cognitive impairment. School employers shared that their ability to gather details and intercede results in alternatives to a TRO that are more productive for their staff and students. Otherwise, school employers may be exposed to greater liability as they try to adhere to contractual agreements for a student's Individualized Educational Plan.

Administrative investigations are also critical tools for public agency employers when protecting minors under the supervision and care of their employees. As it relates to preventing childhood sexual assault and misconduct, perpetrators are not often caught in the act at a school site or facility but rather discovered through investigations conducted by the employer through either building evidence for what may lead to a criminal investigation or removing an employee before misconduct may occur. The current liability statewide for school employers alone is approximately $3 billion dollars and districts need every tool available to prevent future misconduct.

AB 340, as drafted, would tie the hands of school employers in seeking better options for student educational outcomes and taking proactive steps for general safety.

Making matters worse, employers may not even know they are acting contrary to AB 340's restrictions by communicating with staff, because only the employee or the representative would know or could decide when a communication was made "in confidence." This could affect day-to-day activities and critical government operations.

For the reasons discussed above, the organizations listed below are respectfully opposed to AB 340. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
aarona@csda.net

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Hurst
Legislative Representative
Urban Counties of California
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Sarah Dukett
Policy Advocate
Rural County Representatives of California
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Johnnie Piña
Legislative Affairs, Lobbyist
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Faith Borges
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California Association of Joint Powers Authorities
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Sarah Bridge
Association of California Healthcare Districts
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Dorothy Johnson
Legislative Advocate
Association of California School Administrators
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Jason Schmelzer
Public Risk Innovation,
Solutions, and Management (PRISM)
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Chris Reefe
Legislative Director
California School Boards Association
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Cailtin Jung
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School Employers Association of California
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Brianna Bruns
Director, Policy & Advocacy
California County Superintendents
bbruns@cacountysupts.org

Dane Hutchings
Legislative Representative
California Association of Recreation and Park Districts
dhutchings@publicpolicygroup.com

Mishaal Gill
Director of Policy and Advocacy
California Association of School Business Officials
mgill@casbo.org

Leilani Aguinaldo
Legislative Advocate
Schools Excess Liability Fund (SELF)
LeilaniA@sscal.com

Nick Romley
Legislative Advocate
Small School Districts' Association
Nick@capitoladvisors.org

Andrew Martinez
Senior Director of Government Relations
Community College League of California
amartinez@ccleague.org

Mario Guerrero
Legislative Director, Business Operations
University of California
State Governmental Relations
Mario.Guerrero@ucop.edu

CC:

The Honorable Patrick Ahrens
Honorable Members, Senate Judiciary Committee
Christian Kurpiewski, Principal Consultant, Senate Judiciary Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 10, 2025

The Honorable Monique Limón
Chair, Senate Natural Resources and Water Committee
1020 N Street, Suite 3220
Sacramento, CA 95814

RE: AB 372 (Bennett) Office of Emergency Services: state matching funds: water system infrastructure improvements.
As Amended April 21, 2025 - SUPPORT

Dear Senator Limón,

On behalf of the California State Association of Counties (CSAC) representing all 58 California Counties, I write to support AB 372 (Bennett) which would establish the Rural Water Infrastructure for Wildfire Resilience Program within the Office of Emergency Services (OES). This program would build upon the successful home hardening efforts by providing state matching funds to communities within the Wildland Urban Interface (WUI) in high and very-high fire severity zones to improve water infrastructure.

In recent years, California has experienced an increasing frequency and intensity of disasters, including wildfires. Each disaster disrupts entire communities, often exceeding the response capacity of local jurisdictions. Counties play a critical role in disaster preparedness, response, and recovery. Local governments are often the first to respond, triggering state and federal aid while leading long-term rebuilding efforts.

CSAC's disaster advocacy focuses on improvements to water resilience and disaster prevention. Counties are often the first responders when a community runs out of water due to drought or water supply disruption. Water infrastructure improvements in rural and WUI areas of the state are necessary not only to buffer drought and flood years, but also as a safeguard during wildfire events. SB 372 will support these goals through upgrading waterlines, increasing connected water systems, and enhancing water delivery in our most vulnerable areas.

For these reasons, CSAC supports AB 372. Should you have any questions, please contact me at cfreeman@counties.org.

Sincerely,

Catherine Freeman
Senior Legislative Advocate

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 10, 2025

The Honorable Aisha Wahab
Chair, Senate Housing Committee
1020 N Street, Room 3330
Sacramento, CA 95814

Re: AB 462 (Lowenthal) – Land use: accessory dwelling units
As Amended on May 13, 2025 – SUPPORT
To be heard in Senate Housing Committee on July 15, 2025

Dear Senator Wahab:

The California State Association of Counties (CSAC), representing all 58 of the state's counties, writes in support of AB 462, which exempts the construction of accessory dwelling units (ADUs) from the requirement to obtain a coastal development permit (CDP) in the County of Los Angeles, and in any county that is subject to a Governor's proclamation of a state of emergency on or after February 1, 2025.

In recent years, California has experienced an increasing frequency and intensity of disasters, including wildfires, droughts, floods, and public health emergencies. Each disaster disrupts entire communities, often exceeding the response capacity of local jurisdictions. These disasters have destroyed tens of thousands of homes and exacerbated the already critical housing shortage in our state. The urgency to rebuild and provide affordable housing options for those displaced by these disasters cannot be overstated. AB 462 addresses this urgent need by streamlining the permitting process for ADUs, allowing homeowners to add much-needed housing units quickly and efficiently to their properties.

ADUs offer a practical and cost-effective solution to our housing crisis. They utilize existing infrastructure and land more efficiently, reduce development costs, and provide homeowners with more immediate housing as their communities recover and rebuild. By increasing the supply of smaller, more affordable homes within existing neighborhoods, ADUs help alleviate housing shortages and improve affordability in high-cost areas. This bill will ensure that homeowners in the Coastal Zone of Los Angeles County and any similarly situated coastal county that experiences a disaster in the future can benefit from a simplified, expedited permitting process, enabling them to contribute to the housing supply without the lengthy and costly CDP process.

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths Inyo County	Susan Ellenberg Santa Clara County	Luis Alejo Monterey County	Bruce Gibson San Luis Obispo County	Graham Knaus

CSAC supports efforts to comprehensively protect communities from future disasters - including wildfires, floods, extreme heat, and other climate-driven events. Additionally, CSAC supports legislation that codifies community recovery and rebuilding best practices so that all counties that experience future disasters can utilize these laws to expedite the restoration of their communities. AB 462 aligns with these efforts and will strengthen county abilities to meaningfully prepare for disasters, provide effective response during the emergency, and expedite post-disaster recovery.

This bill represents a vital step towards increasing housing affordability, providing relief to disaster-affected communities, and promoting sustainable development in California. For these reasons, CSAC is proud to support AB 462. If you have any questions, please contact Mark Neuburger at mneuburger@counties.org.

Sincerely,

Mark Neuburger
Legislative Advocate

Cc: The Honorable Josh Lowenthal, Member of the California State Assembly
Members and Staff, Senate Housing Committee

July 6, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, 412
Sacramento, CA 95814

RE: AB 538 (Berman): Public works: payroll records
As Amended May 23, 2025 – OPPOSE
Set to be heard in the Senate Appropriations Committee July 7, 2025

Dear Senator Caballero,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), and the California Special Districts Association (CSDA) respectfully oppose Assembly Bill (AB) 538 because it would place an unnecessary burden on local agencies.

Current law requires contractors and subcontractors for public works projects to maintain payroll records for all workers employed as part of a public works project. Current law also requires that a certified copy of those records be made available upon request by either a body awarding the contract (e.g. a county or city) or by the Division of Labor Standards and Enforcement (DLSE). Current law empowers DLSE, not awarding bodies, to penalize contractors or subcontractors for failing to respond to a records request by either an awarding body or DLSE. Despite this reality, the bill only requires local agencies to seek out records not in their possession and lacks any language to compel the only body with enforcement powers, DLSE, to seek out the records.

Additionally, Section 2 declares that the bill is not a reimbursable state mandate, asserting that the only costs incurred by a local agency or school district will be due to changes to a crime or infraction. We disagree. While the proposed amendment to Labor Code § 1776 (b)(4) provides that non-compliant contractors shall have progress payments withheld in accordance with the existing penalty established in Labor Code § 1776(h), it is clear that the adjustment to how penalties may be assessed are not the *only costs that may be incurred by a local agency.* The bill clearly mandates a new activity by local agencies: seeking records from a public works contractor or subcontractor when the local agency is not in possession of those records, redacting those records, and providing them to the requesting entity.

Additionally, the provisions relied upon for this incorrect assumption (Gov. Code, § 17556, subd. (g)), is itself constitutionally suspect. The State's subvention requirements and exemptions to those requirements are established by the California Constitution (Cal. Constit., art. XIIIB, § 6.) As relevant here, that provision only exempts from the subvention requirement "legislation defining a new crime or changing an existing definition of a crime." Section 17556(g) goes beyond the constitutional exemption from the subvention requirement by including the provision relied upon by the author here: a change in the penalty for a crime or infraction.

Given this concern, CSAC urges the committee members and consultants not to adopt an overly broad a reading of Section 17556(g) and consider the full costs of this bill, which include significant direct costs to the state and ongoing reimbursable costs to local governments. In total, the bill would directly cost the state $876,000 in the

first year and $828,000 ongoing for implementation by DLSE and lead to unknown, but potentially significant, ongoing costs to reimburse local governments for the new mandated service.

Additionally, we believe the language in Section 2 should be amended to clearly declare that the bill would establish a new mandate reimbursable under state law. While, ultimately, the decision on whether or not a bill is a state mandate rests on the Commission on State Mandates' consideration of actual implementation of a bill, and not on the assertions in bill language, we believe this amendment more appropriately accounts for the bill's true impacts.

In closing, we believe this bill unnecessarily adds to the administrative burdens of local agencies at a time when their resources are being further stretched due to increasing state mandates, emergency response, and federal uncertainty.

For these reasons, CSAC, UCC, RCRC, Cal Cities, and CSDA regretfully oppose AB 538 (Berman) and respectfully request your NO vote. Should you have any questions or concerns regarding our position, please do not hesitate to contact us.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
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Sarah Dukett
Policy Advocate
Rural County Representatives of California
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Damon Conklin
Legislative Advocate
League of California Cities
DConklin@calcities.org

Anthony Tannehill
Legislative Representative
California Special Districts Association
anthonyt@csda.net

cc: The Honorable Marc Berman, California State Assembly
Members and Consultants, Senate Appropriations Committee

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 10, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, 412
Sacramento, CA 95814

RE: AB 650 (Papan) Planning and zoning: housing element
As amended on April 24, 2025– Notice of Support
To be Heard on July 14, 2025

Dear Senator Caballero,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of AB 650 (Papan). This bill would allow local governments to begin the housing element update process six months early, provide greater certainty and reduce ambiguity in the housing element review process, and ensure that local governments have adequate time to respond to the California Department of Housing and Community Development's (HCD) review letters.

Since 1969, California's local governments have planned and selected sites for housing at all income levels through the housing element portion of a local government's general plan. Every five to eight years, local governments are required to adopt a blueprint outlining where developers can or cannot build residential developments within their respective communities and obtain certification from HCD. Local governments plan for their fair share of housing development as determined through the Regional Housing Needs Allocation (RHNA) process. As part of this complex process, local governments submit in their housing elements a variety of essential data, actions, and programs to promote fair, equitable, and affordable housing in their community. Currently, local jurisdictions are planning and zoning for nearly 2.5 million additional homes statewide.

During the 6th RHNA cycle, local governments experienced various challenges in obtaining certification from HCD. Some of the challenges include a short timeline for completing these complex documents and responding to HCD's feedback, a lack of clarity regarding what the state expects from local governments when reviewing additional housing element drafts, and the introduction of new requirements late in the housing element review process.

CSAC Officers | **President** Jeff Griffiths, Inyo County | **1st Vice President** Susan Ellenberg, Santa Clara County | **2nd Vice President** Luis Alejo, Monterey County | **Past President** Bruce Gibson, San Luis Obispo County | **CEO** Graham Knaus

AB 650 would address these issues by allowing local governments to begin updating their housing element six months early. The bill would also require HCD to provide specific text and analysis that must be included in the housing element to remedy deficiencies, ensuring that local governments are not penalized when HCD identifies additional deficiencies not previously identified in prior review letters.

For these reasons, CSAC supports AB 650. Should you have any questions regarding our position, please do not hesitate to contact me at mneuburger@counties.org.

Sincerely,

Mark Neuburger
Legislative Advocate, CSAC

CC : The Honorable Diane Papan
Members, Assembly Appropriatons Committee

July 11, 2025

The Honorable Sabrina Cervantes, Chair
Senate Elections and Constitutional Amendments
1020 N Street, Room 533
Sacramento, CA 95814

Re: **AB 699 (Stefani): Elections: local tax measures.**
As amended July 3, 2025 - SUPPORT
Set to be heard in Senate Elections and Constitutional Amendments on July 15, 2025

Dear Senator Cervantes:

On behalf of the California State Association of Counties and the Urban Counties of California, we write to express our support for Assembly Bill (AB) 699, which will allow election officials to refer voters to the Voter Information Guide for detailed tax rate information rather than requiring the lengthy tax rate information to appear directly on the ballot. This would increase transparency by giving more information to voters for local bond and tiered-rate tax measures.

Current law requires counties to include very specific financial and technical information in each 75-word ballot label, including the amount of money to be raised annually by the tax and the rate and duration of the tax. However, the 75-word limit can be too restrictive for accurately and clearly summarizing complex tax and bond measures, which can lead to voter confusion and misinterpretation of the proposals.

AB 699 would improve ballot transparency for local bond and tax measures, giving voters more information about how the measures would affect their taxes. The provisions of this bill would allow local agencies to do this by including in the ballot

label the words “See voter guide for measure information statement” and then providing detailed information about the measure’s effects on taxes in the voter guide.

This bill would not only give local agencies the alternative to remove the confusing language currently required, it would give them the opportunity to provide more, and clearer, information in the voter guide so voters can make informed decisions.

For these reasons, we are proud to support AB 699 and respectfully request an AYE vote. Should you have any questions about our position, please do not hesitate to contact us.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

CC: The Honorable Catherine Stefani
Members and Consultants, Senate Elections and Constitutional Amendments Committee
Scott B. Matsumoto, Principal Consultant, Senate Elections and Constitutional Amendments Committee
Cory Botts, Consultant, Republican Caucus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 10, 2025

The Honorable Aisha Wahab
Chair, Senate Housing Committee
1021 O Street, Room 3330
Sacramento, CA 95814

Re: AB 1021 (Wicks) – Housing: local education agencies.
As Amended on July 3, 2025 – SUPPORT
Set to be heard in Senate Housing Committee on July 15, 2025

Dear Senator Wahab:

On behalf of the California State Association of Counties (CSAC), we write in strong support of Assembly bill 1021 (Wicks). We support this bill's effort to improve access to educational workforce housing for school district employees across California. CSAC recognizes the need for affordable housing that is accessible and available to meet the needs of California residents at all income levels and in all geographic areas. Unfortunately, we also realize that the CEQA process is too often used as a legal tool to delay or stop reasonable housing development. CSAC supports the efforts of this bill to simplify the CEQA process and its requirements.

AB 1021 builds on the progress made in past legislation by removing key obstacles that currently prevent local educational agencies (LEAs) from developing workforce housing on their own properties. Specifically, the bill expands the number of LEA-owned sites eligible for residential development, establishes a feasible housing density for school employees, adds workforce housing to an existing CEQA exemption for affordable infill projects, and makes crucial clarifications to various state codes to provide certainty to LEAs and local governments.

By streamlining the process for LEAs to provide affordable housing for their employees, AB 1021 will help ensure that teachers, administrative staff, bus drivers, custodial staff, and other critical school employees can live closer to the schools they serve. This will strengthen local communities, improve student outcomes, and enhance retention rates for education professionals who are essential to the success of our schools.

For these reasons, we are proud to **"support"** AB 1021. If you have any questions, please contact Mark Neuburger at mneuburger@counties.org.

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Sincerely,

Mark Neuburger
Legislative Advocate, CSAC

Cc: The Honorable Buffy Wicks, Member of the California State Assembly
Members and Staff, Senate Housing Committee

July 8, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
1021 O Street, Room 412
Sacramento, CA 95814

RE: **AB 1109 (Kalra) Evidentiary Privileges: Union Agent-Represented Worker Privilege.**
OPPOSE *(As Introduced February 20, 2025)*

Dear Chair Caballero,

The California Special Districts Association (CSDA), League of California Cities (Cal Cities), California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), Association of California School Administrators (ACSA), University of California, Association of California Healthcare Districts (ACHD), California Association of Recreation and Park Districts (CARPD), School Employers Association of California (SEAC), California School Boards Association (CSBA), California County Superintendents, Small School Districts' Association (SSDA), Alameda County Office of Education, Dublin Unified School District,

Pleasanton Unified School District, Community College League of California, California Association of Joint Powers Authorities (CAJPA), Schools Excess Liability Fund (SELF), Public Risk Innovation, Solutions, and Management (PRISM), California Association of School Business Officials (CASBO), and the University of California, write to inform you of our respectful opposition to Assembly Bill (AB) 1109 (Kalra). This bill would inhibit an employer's ability to conduct investigations to the detriment of employees' and the public's safety and well-being, add new costs and liability for public employers, and interfere with administrative and judicial proceedings necessary to protect the public's interest and public agencies' duty to be responsible stewards of public funds.

Previous Legislation and Previous Veto
Our concerns with AB 1109 are consistent with the issues raised in response to previously introduced legislation, AB 729 (Hernandez, 2013), AB 3121 (Kalra, 2018) and AB 418 (Kalra, 2019), AB 2421 (Low, 2024), and AB 340 (Ahrens, 2025). The issues are succinctly captured in the AB 729 veto message from Governor Brown, which states: "I don't believe it is appropriate to put communications with a union agent on equal footing with communications with one's spouse, priest, physician or attorney. Moreover, this bill could compromise the ability of employers to conduct investigations into workplace safety, harassment and other allegations."

New Costs and Enhanced Impacts for the State, Local Governments, and Schools
In order to conduct proper investigations that uphold the public's trust, protect against the misuse of public funds, and ensure the safety and well-being of both public employees and the public, it is critical that a public employer has the ability to interview all individuals with relevant information to ascertain the facts and understand the matter fully. AB 1109 would increase investigation and litigation costs for the state as well as local governments and schools due to incomplete investigations, because appropriate witnesses may refuse to disclose relevant information based on a faulty or incorrect understanding of AB 1109. For schools, this is a drain of Proposition 98 funding.

Although AB 1109 provides that a union agent may reveal a confidential communication made to the agent if required to do so by a court order, this provision notably fails to include "a represented employee or former represented employee" as a party that could be compelled to reveal a confidential communication between the employee and union agent pursuant to a court order. Moreover, this provision would add significant costs to the state, local governments, and schools, requiring them in some cases to expend resources to obtain a court order to reveal allegedly "confidential communications" related to otherwise routine workplace investigations as discussed further below.

Creation of New One-Sided Standard, Lacking Important Safeguards
The scope of privilege akin to an attorney-client relationship is carefully defined by state law. Privilege is by design narrow in scope to protect the confidentiality and integrity of relationships, both medical/professional and familial in nature, where highly sensitive and deeply personal information is exchanged. AB 1109 fails to recognize this well-established threshold for creating a right of privilege and instead would create a new, broad privilege for public employees and their unions, without requisite limits on how the privilege functions.

Unlike other privileges that apply to both sides of the litigation or proceedings such as the attorney-client privilege, AB 1109 does not bestow the same privilege upon management-labor negotiator communications, or communications among members of management regarding labor union disputes or grievance issues. Consequently, in labor related proceedings before courts and the California Public Employment Relations Board (PERB) hearings, an employer could be forced to disclose all such communications, while the union or employee could shield relevant and otherwise

discoverable communications from disclosure pursuant to the terms proposed in AB 1109.

The bill would also impede a public employer's ability to defend itself or assert its interests in other adversarial processes given that the bill applies to compelled disclosures to any court or to any administrative board or agency, or in any arbitration or other proceeding. Proceeding is defined in Evidence Code Section 901 to mean "any action, hearing, investigation, inquest, or inquiry (whether conducted by a court, administrative agency, hearing officer, arbitrator, legislative body, or any other person authorized by law) in which, pursuant to law, testimony can be compelled to be given." The word "grievance" is included in the bill for purposes of defining a covered union agent, adding more uncertainty as to the types of matters covered by the bill.

AB 1109 is lacking important guardrails commonly applicable to other privileges in the professional context, including:

- The lack of standards to prevent the potential for conflict between the proposed union agent privilege and the union agent's duty to represent the bargaining unit as a whole. A union agent could not reconcile the privilege of one employee with his or her duty to represent a second employee if those employees are adverse to each other. The potential for conflict is further exacerbated because, unlike attorney-client privilege where the client is the holder of the privilege, AB 1109 would make both the union agent and the employee holders of the privilege.
- The lack of education, training, certification or qualifications required for a union agent to hold the privilege under AB 1109. Other professional, non-familial privileges require years of education, certification and training.
- The lack of enforcement mechanisms, such as sanctions or penalties, to ensure proper use and observance of the privilege. With the other professional privileges, there is typically a disciplinary or licensing body with the authority to take corrective action in the event the privilege is abused or misused. There is no such mechanism in AB 1109.

Taken together, AB 1109's expansion of the evidentiary privilege is anything but straightforward, raising irreconcilable conflicts and concerns not present with established evidentiary privileges.

Endangers Workplace Safety
AB 1109 potentially interferes with the ability to obtain information from witnesses relevant to workplace safety and other matters. The bill permits the silencing of employees who wish to voluntarily report knowledge or information related to an incident or from testifying because it provides that "[a] represented employee or represented former employee also has a privilege to prevent another from disclosing a confidential communication between the employee and a union agent that is privileged pursuant to this section." While AB 1109 includes narrow exceptions for criminal proceedings, the disclosure of many important communications may be hindered by the bill's limitations, putting safety at risk. Shockingly, the bill's exception providing that there is no privilege if the union agent reasonably believes that disclosure is necessary to prevent a criminal act that the union agent reasonably believes is likely to result in death or substantial bodily harm leaves employee safety entirely to the discretion of the union agent.

This bill would also limit the ability of public employers to carry out the requirements of recently enacted law, Senate Bill 553 (Cortese, 2023), which includes conducting investigations into workplace safety, harassment, and other allegations. As of January 1, 2025, SB 553 allows collective bargaining representatives standing to seek temporary

restraining orders (TRO) in connection with workplace violence. AB 1109 will create a problematic scenario wherein a TRO may be obtained by a union but an employer would be inhibited from investigating the underlying facts. As noted above, AB 1109 lacks guardrails to prevent potential conflicts of interest that could arise during employee safety issues.

For the reasons discussed above, the organizations listed below are respectfully opposed to AB 1109. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Johnnie Piña
Legislative Affairs, Lobbyist
League of California Cities
jpina@calcities.org

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Kinney Hurst
Legislative Representative
Urban Counties of California
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Sarah Dukett
Policy Advocate
Rural County Representatives of California
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Aaron Avery
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California Special Districts Association
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Faith Borges
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California Association of Joint Powers Authorities
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Sarah Bridge
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Andrew Martinez
Senior Director of Government Relations
Community College League of California
amartinez@ccleague.org

Michael Pott
Chief Legal Counsel
Public Risk Innovation,
Solutions, and Management (PRISM)

Chris Reefe
Legislative Director
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Association
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Cailtin Jung
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School Employers Association of California
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Brianna Bruns
Director, Policy & Advocacy
California County Superintendents
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Dane Hutchings
Legislative Representative
California Association of Recreation and
Park Districts
dhutchings@publicpolicygroup.com

Lucy Salcido Carter, M.A., J.D.
Director of Policy and Governance
Alameda County Office of Education
lcarter@acoe.org

Heather Campos
Assistant Superintendent, Human Resources
Dublin Unified School District

Nimarta Grewal
Assistant Superintendent, Human Resources
Pleasanton Unified School District

Leilani Aguinaldo
Legislative Advocate
Schools Excess Liability Fund (SELF)
LeilaniA@sscal.com

Nick Romley
Legislative Advocate
Small School Districts' Association
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Mario Guerrero
Legislative Director, Business Operations
University of California
State Governmental Relations
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Mishaal Gill
Director of Policy and Advocacy
California Association of School
Business Officials
mgill@casbo.org

CC:

The Honorable Ash Kalra
Members of the Senate Appropriations Committee
Liah Burnley, Consultant, Senate Appropriations Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

July 7, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
California State Capitol, Room 412
Sacramento, CA 95814

RE: AB 1288 (Addis and Valencia) Registered environmental health specialists.
As Amended April 10, 2025 – SUPPORT
Set for Hearing on July 14, 2025

Dear Senator Caballero,

On behalf of the California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and Urban Counties of California (UCC), we write in support of Assembly Bill 1288, authored by Assembly Members Addis and Valencia, which would extend the time in which local health/environmental health departments may train and employ a local Registered Environmental Health Specialist (REHS) trainee from three years to five years. The latest amendments also include additional provisions to strengthen and facilitate the process to become an REHS trainee, allow them to successfully complete their trainee period, and allow more opportunities to take the certification test.

Currently, certification for the REHS program is administered by the California Department of Public Health (CDPH). The program ensures that a certified REHS has met adequate education, training and experience requirements and has passed a comprehensive state examination. While working towards certification, individuals may be employed as a REHS trainee by local health/environmental health departments for up to three years. However, limited examination offerings and strict time limitations governing how often a trainee may take the exam have resulted in trainees being reassigned or released – even if they wish to continue to pursue a career as a certified REHS. The current state examination passage rate averages around 60 percent.

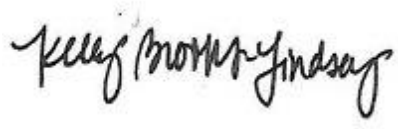
The REHS plays a critical role in safeguarding our communities, and recent public health emergencies and climate-driven disasters have only increased counties' need for a strong REHS workforce. AB 1288 as amended will aid counties in addressing ongoing recruitment and retention challenges currently impacting the public health workforce and expand opportunities for entry-level employees to continue advancing their careers within their own communities.

For these reasons, our organizations are pleased to support AB 1288. Please do not hesitate to reach out with any questions.

Sincerely,

Jolie Onodera
Senior Legislative Advocate
California State Association of Counties
jonodera@counties.org
916-591-5308

Sarah Dukett
Senior Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org
916-447-4806



Kelly Brooks-Lindsey
Legislative Advocate
Urban Counties of California
kbl@hbeadvocacy.com
916-753-0844

cc: The Honorable Dawn Addis, California State Assembly
The Honorable Avelino Valencia, California State Assembly
Honorable Members and Consultants, Senate Appropriations Committee
Farrah McDaid Ting, Deputy Director of Policy, County Health Executives Association of California

July 7, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: **AB 1293 (Wallis) – Qualified Medical Evaluator Report Quality**
SUPPORT, AS AMENDED 4/9/2025

Dear Chair Caballero,

The undersigned organizations are pleased to **SUPPORT AB 1293 (Wallis)**, which will improve the quality of medical-legal evaluations necessary to resolve disputes in the workers' compensation system.

According to the Commission on Health and Safety and Workers' Compensation's (CHSWC), in 2023 California's workers' compensation system covered 16.7 million employees who reported a total of 748,982 occupational injuries and illnesses with a total cost of $22.3 billion.[1] California's worker's compensation system is known to be expensive, complex, and litigious.

The various parties in the system – claims administrators, doctors, injured workers, attorneys – experience a wide range of disputes that need to be resolved quickly and effectively to avoid delays. Some disputes require the use of the state-administered Panel QME Process, whereby the Division of Workers' Compensation sends a panel of three independent doctors who are available to complete a medical legal report to resolve the dispute. In 2022 the state received

[1] CHSWC 2023 Annual Report, Page 30

192,600 requests for QME Panels and assigned 141,239 Panels[2]. These are not minor disputes being resolved – these reports determine whether temporary disability continues, whether a requested medical treatment is appropriate, or how much permanent impairment a worker has suffered from the injury.

Unfortunately, the Panel QME reports are frequently inadequate for the purpose of resolving disputes in the system. Resolution of disputes is frequently delayed so a supplemental report can be prepared or so the parties can depose the Panel QME. These delays harm injured workers and increase costs for employers. AB 1293 seeks to improve the quality of Panel QME reports with the aim of resolving disputes faster. Specifically, the bill requires the Division of Workers' Compensation (DWC) to take three actions:

- **Implement State Auditor's Recommendation for Evaluating QME Report Quality**
  In 2019 the legislature asked the California State Auditor to evaluate the Panel QME system. One recommendation from the auditor was for the DWC to create and implement a plan to review the quality and timeliness of reports so that the state can ensure efficient resolution of workers' compensation claims. AB 1293 creates a statutory requirement for the DWC to implement this recommendation and ensure that Panel QME reports are timely, complete, and sufficient to resolve disputes. The bill also requires that the required annual reports are made available to the public.

- **Develop a Template Panel QME Request Form**
  Labor Code Section 4062.3 outlines the types of information that can be provided to Panel QMEs and the process for doing so. Despite these guidelines, QMEs often receive incomplete or inadequate case information, which can compromise the accuracy and utility of their reports. AB 1293 requires the DWC to create and make available a template Panel QME request form that will help guide system stakeholders to provide the relevant information to medical evaluators.

- **Create a Template for Panel QME Reports**
  To improve the clarity and consistency of Panel QME evaluations, AB 1293 directs the DWC to develop and distribute a standardized QME report template. When used alongside more complete request submissions, this measure will facilitate the production of higher-quality medical reports, thereby reducing the need for costly and time-consuming follow-ups.

All the actions described above would be subject to the Administrative Procedures Act so that injured workers, labor representatives, doctors, employers, and other stakeholders are given thorough opportunity to contribute as the processes are developed and implemented. There is, of course, a cost to the state to have the DWC implement AB 1293, but all costs for the DWC are paid by direct fees on employers and there is no general fund impact.

For these reasons, we are proud to **SUPPORT** your **AB 1293**.

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[2] CHSWC 2023 Annual Report, Page 117

Sincerely,

Acclamation Insurance Management Services (AIMS)
Agile Occupational Medicine
Allied Managed Care (AMC)
Association of California Healthcare Districts
California Alliance of Self-Insured Groups, Inc.
California Association of Joint Powers Authorities
California Attractions and Parks Association
California Chamber of Commerce
California Coalition on Workers' Compensation
California Joint Powers Insurance Authority
California League of Food Producers (CLFP)
California Restaurant Association
California State Association of Counties
Coalition of Small and Disabled Veteran Businesses
Flasher Barricade Association (FBA)
Keenan
Public Risk, Innovation, Solutions and Management (PRISM)
Rural County Representatives of California
Self-Insured Schools of California
Urban Counties of California

CC: Members and Consultants, Senate Appropriations Committee

July 8, 2025

The Honorable Thomas Umberg
Chair, Senate Committee on Judiciary
1021 O Street, Room 6740
Sacramento, CA 95814

Re: **AB 1331 (Elhawary): Workplace surveillance**
As amended 6/19/2025 – OPPOSE
To be heard in Senate Committee on Judiciary July 15, 2025

Dear Chair Umberg,

On behalf of the California State Association of Counties (CSAC); Urban Counties of California (UCC); Rural County Representatives of California (RCRC); Public Risk Innovation, Solutions, and Management (PRISM); California Special Districts Association (CSDA); Association of California School Administrators (ACSA); League of California Cities (Cal Cities); California School Boards Association (CSBA); the California Association of Recreation and Park Districts (CARPD); and the California Association of School Business Officials (CASBO) we write in respectful opposition to AB 1331 (Elhawary), which would vastly complicate the routine work of local governments and schools, endanger our ability to perform essential public services, impede our ability to manage and respond to workplace violence threats, and make local governments and schools vulnerable to waste, fraud, and abuse of public resources.

Our coalition insists that this bill is wrongly applied to local governments and should be **amended to fully exempt local agencies and schools**. The bill imposes unnecessary security risks for local agencies, schools, and the public we serve. The right of public employees to organize is well protected from the types of behavior this bill intends to address. Our coalition would remove opposition if local agencies were removed from the bill.

Needlessly endangers public employees and those they serve

Even with the proposed amendments, AB 1331 would needlessly interfere with the ability of local agencies to protect foster children, keep kids safe in schools, and maintain the safety of their workforce or the communities they serve—including election facilities, libraries, and shelters for the unhoused. The unpublished amendments allow for the use of surveillance tools if "required by state and federal law or regulations". While this amendment may allow *some* facilities to continue to use necessary security tools, it is unclear the extent to which this amendment will allow public agencies to protect critical infrastructure and government facilities. Put simply, state and federal laws are rarely prescriptive about the use of security tools – the need for security is implicit. Further, this attempt to exclude certain locations, including airports, from the law's provisions is a clear acknowledgement that AB 1331 creates security gaps for critical facilities.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life and appreciate that one could imagine that appropriate limits are needed to prevent employers from snooping into the private lives of their employees. However, the scope of this bill is vast and would deem basic security tools used for everyday work, including security cameras, collaboration tools like Teams or Slack, or GPS tools used to track fleets, to be "surveillance tools" whose use would be constricted. Under AB 1331, any device that collects or facilitates collection of data of an employee's movements, actions, communications, or behaviors, is deemed a surveillance tool that cannot be used when employees are off duty or in "employee only" areas.

AB 1331 will needlessly endanger public workforces and severely impair our ability to prevent and investigate instances of workplace violence. The bill restricts the ability for public agencies to review data collected through a surveillance tool in any "off-duty area," defined to include breakrooms and cafeterias unless directed by a court order or upon request by either a court, law enforcement, or by an employee. These restrictions needlessly inhibit the use of tools that can be used to keep employees safe from workplace violence incidents or, worse, provide the worst actors with a roadmap of locations where they can more easily hide bad behavior, including abuse of vulnerable populations like children, the elderly, or those experiencing mental health crises.

Under AB 1331, employees must be allowed to leave behind surveillance tools during off-duty hours or when they are entering off-duty areas. It's unclear how these rules would apply to a variety of tools that public employees may be required to use, including emergency alarms for teachers, body cameras for law enforcement, or tools used for public vehicle fleets, including dash cameras, speed monitors, or GPS tracking. Consider election workers, who could be allowed to leave behind tracking tools used to track the delivery and pickup of ballots. The ability for an employee to claim they had simply been "at rest," will give those who are rightfully required to wear surveillance tools an easy out for

any behavior that conflicts with laws or agreements that require wearable tools for public and employee safety.

Unfortunately, we have seen rising hostility and threats against government entities and their workforces. That includes violence and threats of violence against government employees whose job requires them to serve the public, like library staff, teachers, firefighters, benefits officers, among myriad other examples. It also includes public officials who are frequently targeted with threats or actual violence, including election workers, health officers, and public officials. AB 1331 would heighten vulnerability for public servants at a time of strong anti-government sentiment.

Amendments raise new privacy and cost concerns
The ability for employees to request video footage also raises critical privacy concerns about the disclosure of those in the footage, placing public agencies in the difficult position of potentially violating an employee's privacy or incurring considerable costs to blur or pixelate the images of those in the footage.

Significantly expands government liability
To compound all of our concerns, AB 1331 imposes severe financial penalties for non-compliance. For public agencies, these penalties can be staggering and severely impact funds needed to provide essential public services. At a time of significant budget constraints at the state and local level, now is not the time to subject public agencies to nuclear fines for providing basic security measures.

Inappropriately applies to public agencies
We understand the sponsors are advancing this bill to address activities by private employers that use security tools to undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union activities. For example, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Put simply, public agencies use the "surveillance tools" defined in this law to protect public resources, employees, and the public – not to influence employee organization activities. We once again urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1331 and urge your "NO" vote.

Sincerely,

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Mishaal Gill
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California Association of School Business Officials

and Park Districts mgill@casbo.org
dhutchings@publicpolicygroup.com

CC: The Honorable Sade Elhawary, Member, California State Assembly
Members and Consultants, Senate Committee on Judiciary

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1100 K Street, Suite 101 | Sacramento, CA 95814

July 9, 2025

The Honorable Matt Haney
Chair, Assembly Housing and Community Development Committee
1020 N Street, Room 156
Sacramento, CA 95814

RE: SB 16 (Blakespear) Ending Street Homelessness Act.
As Proposed to be Amended – Oppose Unless Amended
Set for hearing July 16, 2025

Dear Assembly Member Haney:

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write to share our oppose unless amended position on Senate Bill 16 by Senator Catherine Blakespear. As proposed to be amended, this legislation would create several requirements for applicants for a Round 7 of the Homeless Housing, Assistance and Prevention (HHAP) program.

CSAC has consistently advocated for the creation of a comprehensive homelessness response system, most recently through the AT HOME framework that has defined roles for counties, cities, and the state, and that would fund those defined responsibilities with sufficient ongoing funding. While CSAC is grateful to the author for her willingness to collaborate related to key elements of a comprehensive homelessness framework, CSAC has concerns with the approach taken by SB 16 based on our understanding of the proposed amendments.

Should the proposed amendments be incorporated, SB 16 would require HHAP Round 7 applicants to identify goals for reaching functional zero homelessness and sign a memorandum of understanding (MOU) committing the applicant to specific responsibilities. CSAC has concerns with the county responsibilities that are outlined as the language is too broad and will capture services that are not county responsibilities and that counties do not receive funding to perform. This includes health and mental health services provided by managed care plans. In addition, case management is not a county responsibility, but varies throughout the state and is often a shared responsibility with other local partners.

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Further, there is no commitment of funding to achieve the functional zero goals and the responsibilities contained in the MOU. These unfunded requirements are occurring in an environment where the HHAP program will not be funded in 2025-26 and may only receive half the normal funding in 2026-27, combined with the dramatic impacts and financial strains that will occur on county health and human services budgets following the passage of the federal reconciliation package. All of these responsibilities should be contingent to the extent that funding is available or funded through an ongoing funding source, which is not addressed in the language.

CSAC has shared recommended amendments with the author to address these concerns. We look forward to further conversations on this bill, but at this time, are writing to share our oppose unless amended position on SB 16. Should you have any questions regarding our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org.

Sincerely,

Justin Garrett
Senior Legislative Advocate

cc: The Honorable Catherine Blakespear
Honorable Members and Consultants, Assembly Housing and Community Development Committee

July 2, 2025

The Honorable Lori D. Wilson
Chair, Assembly Transportation Committee
1020 N Street, Room 112
Sacramento, CA 95814

RE: SB 86 (McNerney): California Alternative Energy and Advanced Transportation Financing Authority Act: sales and use tax exclusion.
As amended on May 23, 2025 – Notice of Opposition
To be Heard in Assembly Transportation Committee July 7, 2025

Dear Chair Wilson:

The League of California Cities (Cal Cities) and the California State Association of Counties (CSAC) must respectfully oppose Senate Bill (SB) 86, which proposes extending the California Alternative Energy and Advanced Transportation Financing Authority's (CAEATFA) Sales and Use Tax Exclusion Program to January 1, 2031, and increasing the maximum amount of the sales and use tax exclusion from $100 million to $200 million annually. While we appreciate the recent amendments to add a sunset and reduce the maximum amount of the exclusion, we continue to have concerns about the revenue loss of up to $109 million annually for local governments, though a portion of this would be backfilled by the General Fund for 2011 realignment programs.

In California, only 3.9375 percent of the sales tax rate (which can total as high as 11.25 percent) impacts the state's General Fund; the remainder – over half – is allocated to:

- Realignment programs where the state has transferred duties to counties;
- Local Bradley-Burns sales tax revenue for cities and counties that funds public safety and other core local services;
- Local transportation programs; and
- Voter-approved local add-on rates (transactions and use taxes) earmarked for transportation, libraries, parks, or other specific or general purposes.

Since SB 86 proposes to continue a program that waives state and local sales taxes, we have concerns because over half of the revenue losses will affect local programs when the affected cities and counties have no role in that decision.

In December 2018, the Legislative Analyst's Office (LAO) issued a report on the CAEATFA sales tax exemption program. One of the issues the LAO identifies is that since the original enactment of the CAEATFA program in SB 71 of 2009, the Legislature has enacted a broad partial manufacturer's sales tax exemption extended through 2030 (that provides a deduction of only the 3.9375 percent portion of the sales tax that only affects the state General Fund). The LAO also identifies that if the CAEATFA program

is not extended, many investments would still qualify for the existing manufacturer's exemption.

While it can be argued that local communities benefit from the investments that companies make when they purchase equipment through the CAEATFA program, there is no nexus in the program between the community benefitting and the communities impacted by the local sales tax losses. In other words, one community may benefit from new investments, but inequity occurs when the sales tax losses are incurred by other communities that receive no such benefit.

For these reasons, we respectfully oppose SB 86, unless it is amended to remove negative impacts on local agencies. Should you have any questions about our position, please do not hesitate to contact us.

Sincerely,

Ben Triffo
Legislative Advocate
League of California Cities
btriffo@calcities.org

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties
ejungwirth@counties.org

cc: The Honorable Jerry McNerney
Members, Assembly Transportation Committee
Daniel Ballon, Consultant, Assembly Republican Caucus

June 27, 2025

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Privacy and Consumer Protection Committee
1020 N Street, Room 162
Sacramento, CA 95814

Re: **SB 238 (Smallwood-Cuevas) Workplace surveillance tools.**
OPPOSE *(As Amended May 1, 2025)*

Dear Assembly Member Bauer-Kahan:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, League of California Cities, Association of California School Administrators, California Association of Joint Powers Authorities, and the Association of California Healthcare Districts, write in respectful opposition to Senate Bill (SB) 238, which would make local governments and schools vulnerable to security threats and limit the effectiveness of tools needed to prevent waste, fraud, and abuse of public resources.

SB 238 Would Widely Apply to Many Technologies
We understand the reasonable concerns about the slow creep of surveillance tools into every aspect of daily life. However, the scope of this bill is vast and would deem banal tools used for everyday work, including badge access, collaboration tools like Teams or Slack, or GPS tools used to track fleets, to be "surveillance tools" whose use could be covered by this bill. Under SB 238, any device that collects or facilitates collection of data of an employee's activities, actions, communications, behaviors, personal information, or biometrics, or those of the public, is deemed a surveillance tool. Given the bill's broad scope, the burdens from compliance with its notification requirements are significant.

SB 238 Would Jeopardize Local Government and Schools Security Efforts
SB 238 would require reporting to the Department of Industrial Relations (DIR), and for the DIR to thereafter publicize, sensitive data on which tools public employers use, their capabilities, and the names of individuals and vendors that run the systems or receive data. Disclosure of this information could provide a material advantage to bad actors seeking to exploit vulnerabilities or gaps in coverage.

Due to the unique aspects of public sector service delivery, public employers may use a variety of surveillance tools to protect employees, students, or the public at large, including emergency alarms for teachers, body cameras for law enforcement, or tools used for public vehicle fleets, including dash cameras, speed monitors, or GPS tracking. Local governments are responsible for securing and operating critical infrastructure, jails, hospitals, police and fire departments, and protecting students in schools.

Further, we have seen rising hostility and threats against government entities and their workforces. That includes violence and threats of violence against government employees whose job requires them to serve the public like library staff, teachers, firefighters, benefits officers, among myriad other examples.

Reporting and publication of the detailed information required by SB 238 could set back public employers' efforts to protect employees and the public.

SB 238 is an Unfunded Mandate on Local Budgets
The initial and ongoing reporting obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. This constitutes an unfunded mandate on public employers without a clear need. For schools, this is a drain of Proposition 98 funding.

Applying SB 238 to Public Employers May Lead to Unintended Consequences
Apart from our general concerns with the measure, there are several provisions of SB 238 which make it particularly ill-suited to the public sector. First, the bill makes several references to "consumers" and appears to be, in part, a consumer protection measure. These references range from the definition of "personal information" to the requirement that the notice required to be provided by a public employer to DIR include information on whether the workplace surveillance tool will impact consumers and whether they are notified, what information will be collected, who can access it, and whether consumer can "opt out." However, local governments and schools are not businesses, operate to provide a public service not for profit, and do not have consumers.

Similarly, the bill's definition of workplace surveillance tool applies the bill's requirements to tools that not only collect data about employees, but also those that collect data from the public. Again, this will lead to unintended results when applied to the public sector, which utilizes important surveillance tools in routine operations such as securing critical infrastructure against threats, securing schools against threats, dash cameras, body-worn cameras, and traffic enforcement tools, jail security, and hospital security, to name just a few.

For public employers with represented workforces, workplace surveillance is often bargained between employees and public employers based on local conditions, security needs, and the concerns of the public workforce. State law already prohibits public employers from using workplace surveillance tools to deter or discourage union membership. Specifically, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Put simply, public employers use surveillance tools to protect public resources, employees, students, and the public at large, not to operate a business. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, our organization must respectfully oppose SB 238. Please feel free to contact us at any time with questions or to further discuss how this measure would affect our members and the communities they serve.

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Faith Borges
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Sarah Bridge
VP, Advocacy & Strategy
Association of California Healthcare Districts
sarah.bridge@achd.org

CC: The Honorable Lola Smallwood-Cuevas
Members, Assembly Privacy and Consumer Protection Committee
Julie Salley, Principal Consultant, Assembly Privacy and Consumer Protection Committee
Lauren Prichard, Consultant, Assembly Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

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July 10, 2025

The Honorable Juan Carrillo
Chair, Assembly Committee on Local Government
1020 N Street, Room 157
Sacramento, CA 95814

RE: SB 262 (Wahab) Housing element: prohousing designations: prohousing local policies.
As amended on July 7, 2025 – Notice of Support
To be heard on July 16, 2025

Dear Assemblymember Carrillo,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of SB 262, which thoughtfully expands the definition of "prohousing local policies" to include programs that help keep people housed, such as safe parking, safe camping, and low-barrier navigation centers.

We commend Senator Wahab for recognizing that addressing California's housing crisis requires not only the construction of new housing but also the stabilization of individuals and families currently experiencing housing insecurity. By acknowledging the importance of supportive services and emergency shelter options, SB 262 promotes a more holistic and humane approach to housing policy.

This bill provides local jurisdictions with meaningful tools and incentives to reduce displacement and support vulnerable populations, while maintaining a strong focus on housing development. We believe this balanced approach will encourage more communities to adopt innovative, compassionate, and effective housing solutions.

To make meaningful progress in helping those who are unhoused, CSAC developed the 'AT HOME' Plan. The six-pillar plan (Accountability, Transparency, Housing, Outreach, Mitigation, and Economic Opportunity) is designed to make true progress to effectively address homelessness at every level - state, local and federal. Through the AT-HOME Plan, CSAC is working to identify the policy changes needed to build a homelessness system that is effective and accountable including specific recommendations related to prevention, housing, the unsheltered response system, and sustainable funding. SB 262 aligns with our AT HOME efforts, specifically as it relates to the shelter portion of the Housing pillar.

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

For these reasons, CSAC supports SB 262 and respectfully requests your 'aye' vote. Should you have any questions regarding our position, please do not hesitate to contact me at mneuburger@counties.org.

Sincerely,

Mark Neuburger
Legislative Advocate, CSAC

CC: The Honorable Aisha Wahab
Staff and Members, Assembly Committee on Local Government

July 8, 2025

The Honorable Ash Kalra, Chair
Assembly Judiciary Committee
1021 O Street, Suite 4610
Sacramento, CA 95814

Re: **SB 346 (Durazo): Local agencies: transient occupancy taxes: short-term rental facilitator**
As amended 7/07/25 - SUPPORT
Set for hearing 7/15/25 – Assembly Judiciary Committee

Dear Assembly Member Kalra:

On behalf of the Urban Counties of California (UCC), the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC), we write to express our support for Senate Bill 346, Senator Durazo's measure that will strengthen local tools to ensure compliance with local ordinances regarding the collection and remittance of transient occupancy taxes (TOT) applicable to short-term rentals.

Regrettably, the application of local TOT ordinances and collection and remittance of taxes is inconsistent and often simply avoided, even when voluntary collection agreements are entered into. Because local agencies do not have access to the address or any other personally identifiable information for listed properties, even under voluntary collection agreements, cities and counties are in the untenable position of choosing between collecting some taxes without this critical information and trusting that it is accurately collected, or trying to pursue collection directly from property owners, which is a time- and cost-intensive process that may or may not result in a fair application of local laws.

By authorizing a local agency to require the short-term rental facilitator to report, in the form and manner prescribed by the local agency, the address of each short-term rental listed on the site, and a mechanism to obtain the assessor parcel number if the address not sufficient to identify the short-term rental, SB 346 will increase TOT compliance and ensure that local agencies are appropriately collecting tax revenue from those that are lawfully licensed short-term rental properties. Further, such authority will assist local agencies in ensuring that TOT obligations are consistent among other short-term stay facilities, like hotels, motels, and bed and breakfasts, and that those that profit from short-

term rental properties are no longer able to obfuscate their location and therefore their tax obligations.

SB 346 is a much-needed effort to modernize California statute and provide local agencies the tools needed to fairly and effectively apply existing laws to evolving technologies. As a result, we are strongly supportive of SB 346 and respectfully urge your aye vote when it comes before your committee.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Emma Jungwirth
Senior Legislative Representative
California State Association of Counties

Sarah Dukett
Senior Policy Advocate
Rural County Representatives of California

cc: Members and Consultants, Assembly Judiciary Committee
Ben Triffo, League of California Cities
Karen Lange, California Association of County Treasurers and Tax Collectors

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July 10, 2025

The Honorable Mike Gipson
Chairman, Assembly Revenue and Taxation Committee
1020 N St., Room 167A
Sacramento, CA 95814

RE: SB 359 (Niello) Use Fuel Tax Law: Diesel Fuel Tax Law: exempt bus operation.
As amended on June 26, 2025 – Notice of Support
To be heard on July 14, 2025

Dear Chairman Gipson,

On behalf of the California State Association of Counties (CSAC), I write in support of SB 359, which establishes clearer guidelines for the California Department of Tax and Fee Administration (CDTFA) regarding county transit programs by clarifying that the sales and use tax exemptions for fuels such as diesel and compressed natural gas (CNG), that apply to public transit operators providing public transit services, also applies to counties that have operated their transit system and use these fuels to power their county-owned transit busses.

The Diesel Fuel Tax Law imposes taxes at a specified rate for the distribution or delivery of each gallon of diesel fuel, and establishes various exemptions from those taxes, including an exemption for an exempt bus operation that consists of, among other things, a transit district, transit authority, or city owning and operating a local transit system. Likewise, the Use Fuel Tax Law imposes a state excise tax at specified rates, generally $0.18 per gallon, on the use of fuel and establishes various exemptions from those taxes, including an exemption for any transit district, transit authority, or city owning and operating a local transit system. However, current law does not consider that several counties operate their own transit system that are not separate authorities or agencies but operated by a county department such as public works. Recently, the State has indicated that because the word "County" is not included in the language of the exemption, these counties that operate their own transit systems do not qualify for the exemption, although they are a public transit operator providing public transit services. This means that counties that operate their transit system are required to pay a tax that other public transit operators are not subject to while providing the same public services.

CSAC Officers

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Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

By adding the word "County" to Revenue and Taxation Code 60039 and 8655, SB 359 will ensure that county transit districts are treated fairly and are added to the list of entities that do not pay sales and use tax on fuels (diesel and CNG). This is extremely important as the State is experiencing a transit operations funding crisis, and the pandemic's impact on changing commute patterns and the loss of fare revenue remain huge challenges. Therefore, SB 359 will help counties that operate transit systems to continue delivering safe, frequent, and reliable transit service to the communities it serves.

For these reasons, the CSAC is proud to support SB 359 and respectfully requests your aye vote on this measure.
Sincerely,

Mark Neuburger
Legislative Advocate
CSAC

CC: Members, Assembly Revenue and Taxation Committee
The Office of the Honorable Roger Niello

July 9, 2025

The Honorable Nick Schultz
Chair, Assembly Public Safety Committee
1021 O Street, Suite 5610
Sacramento, CA 95814

RE: SB 485 (Reyes) – Appointment of County Public Defender
As amended 4/7/2025 – Oppose Unless Amended
Set for hearing 7/15/2025 – Assembly Public Safety Committee

Dear Chair Schultz:

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we write to respectfully express our joint opposition to SB 485, unless amended to include provisions that offer essential checks and balances regarding the appointment and removal of board of supervisors-appointed county public defenders.

SB 485 proposes to change the public defender's employment status from at-will to one in which removal may only occur by a majority vote of the local board of supervisors and only for neglect of duty, malfeasance, misconduct in office, or other good cause. While we understand and respect the underlying objective to ensure independence in this important role, we believe the bill, as currently written, lacks key structural safeguards. Our request for amendments is rooted in principles of good governance, organizational consistency, and process clarity – standards that we would be seeking to accompany statutory changes in the employment status for any appointed county department head.

Specifically, CSAC, UCC, and RCRC are respectfully requesting amendments that would:

- Establish a defined term of office such as the four-year term outlined in Government Code section 27640 for county counsel; and
- Set forth a clear process for judicial review should a public defender contest their removal from office.

CSAC, UCC, and RCRC are concerned about the long-term implications of a perpetual appointment if it is not paired with routine performance oversight or a structured review process. These additional elements are needed to ensure that all department heads are held to the same standards to meet their various responsibilities adequately. Public accountability is an essential element of county governance, and it is both reasonable and prudent to provide clear procedures in the event of a contested termination.

As organizations representing California's elected county supervisors, we urge the committee's consideration of these amendments, which seek to (1) ensure appropriate governance safeguards and (2) maintain comparability across appointed county leadership positions. If this measure were enacted without these amendments, the public defender's employment status would be an outlier in the broader county organizational framework for non-elected department heads.

Finally, we want to underscore that our proposed changes are not intended to – and would not in practice – interfere with a public defender's constitutional obligation to provide clients with ethical and competent legal representation. We appreciate your committee's consideration of the county associations' requested amendments and welcome the opportunity to discuss further.

Please feel free to contact Ryan Morimune at CSAC (rmorimune@counties.org), Elizabeth Espinosa at UCC (ehe@hbeadvocacy.com), or Sarah Dukett at RCRC (sdukett@rcrcnet.org) for any questions on our associations' perspectives. Thank you.

Sincerely,

Ryan Morimune
Senior Legislative Representative
CSAC

Elizabeth Espinosa
Legislative Representative
UCC

Sarah Dukett
Policy Advocate
RCRC

Cc: The Honorable Eloise Gómez Reyes, Member of the Senate
Members and Counsel, Assembly Public Safety Committee

July 7, 2025

The Honorable Lisa Calderon
Chair, Assembly Insurance Committee
1020 N Street, Room 369
Sacramento, CA 95814

RE: SB 487 (Grayson) – Workers' Compensation Third Party Recovery
OPPOSED

Dear Chair Calderon,

The undersigned organizations are respectfully opposed to **SB 487**, which would limit the right of public agency employers, including the State of California, to recover the cost of providing workers' compensation benefits when a law enforcement officer or firefighter is injured at work and a third party is partially or entirely responsible. Public safety officers enjoy generous salary continuation benefits, presumptions for several types of injuries and illnesses, and Industrial Disability Retirement (IDR) benefits that aren't available to any other type of worker in the state. As a result, state and local governments have a higher cost of providing workers' compensation benefits to police officers and firefighters, and recovering costs from responsible third parties is vitally important to protect public resources and the taxpayers.

<u>No Data to Justify Proposed Policy</u>
The legislature has a strong history of closely examining proposed workers' compensation policy changes through the joint labor-management Commission on Health and Safety and Workers' Compensation (CHSWC). According to the CHSWC website, it was created in 1993 to examine health

and safety and workers' compensation systems and recommend administrative or legislative modifications to improve their operation. In recent years, the legislature has often turned to CHSWC for answers when, much like with SB 487, they are confronted with proposed workers' compensation legislation that is based largely on anecdote instead of data.

When an employee is injured by a third party during the course and scope of their employment, the employer, regardless of who is at fault, must provide full workers' compensation benefits. This includes all forms of disability, both temporary and permanent, any associated expenses and vocational rehabilitation if applicable. In addition, the employer is bound to provide medical treatment for the duration of that employee's life for the injured body parts or conditions. An example of an injury sustained at the fault of a third party is when a motor vehicle accident occurs outside of the employer's premises and outside of the employer's control. Regardless, the employer is still obligated to provide all statutory workers' compensation benefits to the employee. As such, the employer's only remedy for reimbursement of the costs incurred because of another party is via subrogation recovery.

The public sector entities affected by SB 487 have limited resources available to provide services to the public. If the legislature is going to upend well-established public policy related to third party subrogation, it should do so only after being fully informed. Proponents of SB 487 have not provided any objective evidence suggesting law enforcement and firefighters are frequently facing bad outcomes in third party litigation related to workplace injuries.

Special Benefits Mean Less Economic Harm for Workers and Higher Costs for Employers

The state and local government employers of police officers and firefighters have high workers' compensation costs precisely because their union representatives have lobbied endlessly for expensive special benefits designed to minimize the economic impact of workplace injuries.

Most employees who are unable to work because of their workplace injury are paid temporary disability benefits at a rate of 2/3 of their average weekly wage, with a maximum benefit amount of $1,680.29 per week in 2025. Instead of receiving normal temporary disability benefits, law enforcement and firefighters who are unable to work because of their workplace injury are paid their *full salaries tax free for an entire year* under Labor Code Section 4850. While it may be hard to believe, those who are receiving benefits under Labor Code Section 4850 take home more than when earning their normal salary. The special benefits both minimize the economic harm to the injured employee and cause the employer to have higher costs associated with the injury.

In addition, a law enforcement or firefighter who is hurt on the job and, as a result, is permanently unable to perform their current position is eligible for Industrial Disability Retirement. The base benefit for IDR is 50% of the final compensation amount, but it can get higher (3% for each year of service), *and the first 50% is non-taxable*. Depending on their tenure, law enforcement and firefighters with longer years of service can take home more pay under IDR than they did while working because of the tax treatment. This amount is paid to the injured employee, in addition to permanent disability benefits paid under the workers' compensation system that are designed to compensate for physical impairment from the injury. Law Enforcement personnel and firefighters receiving IDR benefits are not precluded from working outside of their classification in other occupations, and working does not reduce the IDR benefit. As a result, many police officers and firefighters receiving IDR benefits are also gainfully employed.

Law Enforcement and firefighters already received costly special benefits that protect them from economic harms associated with injuries. The legislature should more closely examine the need to also

allow these employees to recover from responsible third parties before their employer who has financed generous special benefits. Benefits paid to first responders come directly out of public agency budgets. State and local governments generally aren't covered by traditional insurance, rather are self-insured, so the costs associated with SB 487 will directly hit their budgets.

For these reasons, the undersigned organizations are respectfully **OPPOSED** to **SB 487** and urge your no vote when the bill is heard in the Assembly Insurance Committee.

Sincerely,

California Association of Joint Powers Authorities
California Coalition on Workers' Compensation
California Joint Powers Insurance Authority
California Special Districts Association
California State Association of Counties
City of Bell
City of Chula Vista
City of Santa Barbara
County of Butte
County of Fresno
County of Humboldt
County of Kings
County of Placer
Golden State Risk Management Authority
League of California Cities
Local Agency Workers' Compensation Excess JPA
Northern California Special Districts Insurance Authority
Public Risk, Innovations, Solutions, and Management
Rural County Representatives of California
School's Insurance Authority
Urban Counties of California

CC: The Honorable Tim Grayson, California State Senate
Members and Consultants, Assembly Insurance Committee
The Honorable Gavin Newsom, California State Governor
Department of Industrial Relations

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 10, 2025

The Honorable Juan Carrillo
Chair, Assembly Committee on Local Government
1020 N Street, Room 157
Sacramento, CA 95814

RE: SB 507 (Limón) Planning and zoning: regional housing needs allocation.
As amended on July 8 2025 – Notice of Support
To be heard on July 16, 2025

Dear Assemblymember Carrillo,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of SB 507, which authorizes voluntary agreements between local governments and federally recognized tribes to allow new tribal housing developments to count toward a locality's Regional Housing Needs Allocation (RHNA).

SB 507 represents a thoughtful and inclusive approach to addressing California's housing crisis by recognizing the vital role that tribal communities can play in regional housing solutions. By enabling partnerships between tribes and local jurisdictions, this bill promotes collaboration, respects tribal sovereignty, and helps ensure that much-needed housing units—particularly for low- and moderate-income households—are not excluded from RHNA calculations due to jurisdictional technicalities.

We commend Senator Limón for advancing this important legislation and urge your support for SB 507 to help foster equitable, community-driven housing development across California.

To make meaningful progress in helping those who are unhoused, CSAC developed the 'AT HOME' Plan. The six-pillar plan (Accountability, Transparency, Housing, Outreach, Mitigation, and Economic Opportunity) is designed to make true progress to effectively address homelessness at every level - state, local and federal. Through the AT-HOME Plan, CSAC is working to identify the policy changes needed to build a homelessness system that is effective and accountable including specific recommendations related to prevention,

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1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

housing, the unsheltered response system, and sustainable funding. SB 507 aligns with our AT HOME efforts, specifically as it relates to the shelter portion of the Housing pillar.

For these reasons, CSAC supports SB 507 and respectfully requests your 'aye' vote. Should you have any questions regarding our position, please do not hesitate to contact me at mneuburger@counties.org.

Sincerely,

Mark Neuburger
Legislative Advocate, CSAC

CC: The Honorable Monique Limón
Members and Staff, Assembly Committee on Local Government

July 10, 2025

The Honorable Juan Carrillo
Chair, Assembly Committee on Local Government
1020 N Street, Room 157
Sacramento, CA 95814

RE: SB 707 (Durazo): Open meetings: meeting and teleconference requirements
As Amended July 8, 2025 – SUPPORT
Set to be heard in the Assembly Committee on Local Government July 15, 2025

Dear Chair Carrillo,

The California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and Urban Counties of California (UCC) write in proud support of SB 707 (Durazo). SB 707 would represent the most extensive changes to the Brown Act in several years, with a variety of changes designed to improve public participation in local government meetings, expand accessibility for members and the public, and includes several provisions that address the needs of local governments. In total, SB 707 represents a balanced approach in the modernization of the Brown Act.

Since late-2024, we have enjoyed a strong working relationship with the Senator, committee staff, and the variety of stakeholders representing local government organizations, civil liberties, the press, and open government advocates. It's often said that the definition of compromise is when no party is satisfied. However, there's reasons for everyone to be satisfied with this law, including:

- Improved accessibility for the public through remote participation provisions, agenda translation, accommodation of interpretation services, outreach provisions, and increased requirements for how agendas and meeting materials are displayed for the public;
- Improved accessibility for members of Brown Act bodies, including extension of the sunset date for existing remote meeting options, new flexibility for advisory body members, new flexibility for multi-jurisdictional body members, clarification that remote disruption of meetings (e.g. "Zoombombing,") can be addressed, and expansion of emergency meeting provisions; and

- Accountability measures, including expanded requirements regarding reporting of closed session decisions for the compensation of department heads and administrative officers, allowing District Attorneys additional time to submit a cease and desist letter for meeting violations, and impose additional restrictions on the use of special meetings for decisions on compensation for a legislative body.

To be clear, there are remaining issues we would like to address in this bill, and we look forward to continuing our efforts with the Senator to address them. To that end, we share the following concerns and suggestions on how to address them.

Remote public comment

Many of our members have concerns about the requirements for providing remote public comment at meetings. These include concerns about cost, as well as concerns regarding impacts to the duration of meetings. We understand the need to balance the provisions of this bill that provide additional public accessibility. While we hope these concerns do not come to fruition, and are comfortable with the requirements in the bill today, we would like to revisit this issue in future years if these concerns are realized.

Remote participation by those with disabilities

We appreciate the amendment to Gov. Code § 54953.8.6(a)(2)(A) that provides an exception from the on-camera requirement for those with disabilities that preclude them from appearing on camera. Currently, this needed exception applies only to those who serve on non-decision-making advisory bodies. We believe the exception should apply to any individual who serves on a Brown Act body and request the same language be added to Gov. Code § 54953(c)(2)(A).

Requirement for physical posting of translated agenda

The proposed addition of Gov. Code § 54953.4(b) would provide additional opportunities for the public to access translated meeting information. While this could mean more accessible information for the public, we want to ensure that it does not make local agencies vulnerable to lawsuits. We request that the language in Gov. Code § 54953.4(b)(1)(A)(3) be amended to the following to ensure it meets its intent of shielding agencies from liability:

"…No action shall be commenced or maintained against an eligible legislative body ~~specifically~~ arising from the content ~~or,~~ accuracy, posting, or removal of any translation provided by the eligible legislative body or posted by any person under this section."

Additionally, some counties use electronic kiosks for posting agendas in public facilities. We would prefer to allow those counties to meet this requirement without replacing those systems by allowing them to post translated agendas on those kiosks or online in lieu of the physical posting contemplated by this provision.

Requirements for subsidiary body presentations

We believe the entirety of Gov. Code § 54953.8.6 represents needed flexibility for non-decision-making advisory bodies. The remote meeting flexibility for these advisory bodies will improve civic participation and diverse community representation by making local advisory bodies more accessible – including persons with disabilities, caregivers, and working Californians who may face barriers to attending meetings in person.

We understand the purpose for Gov. Code § 54953.8.6(a)(4)(B), as it is designed to ensure that advisory bodies are heard in an in-person meeting of a legislative body at least once annually. However, given the broad duties of our local bodies and the difficult nature of addressing all matters of public concern at these meetings, we believe some changes are needed to balance the core work of legislative bodies with the participation of advisory bodies.

Additionally, the current language will require *all* advisory bodies to complete an annual report, which not all currently do. This may seem to be a small requirement, but these bodies already face challenges in reaching quorum and lack full-time professional staff.

To that end, we request amendments that remove the requirement that advisory bodies both complete and present an annual report. To better strike the balance of ensuring that advisory body reports are heard, we would appreciate an amendment that allows an advisory body to request a presentation on their recommendations to their legislative body—and require that those presentations not be allowed to be placed on the consent file.

In conclusion, we believe these remaining challenges can be addressed. Once again, we the willingness of Senator Durazo and committee staff to work with local government associations on this critical legislation and look forward to our continued efforts on SB 707.

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we are proud to support SB 707.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

Jean Hurst
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

cc: The Honorable Senator María Elena Durazo
Members and Consultants, Assembly Local Government Committee
Angela Mapp, Chief Consultant, Assembly Local Government Committee
Sarah Haynes, Consultant, Assembly Republican Caucus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 9, 2025

The Honorable Matt Haney
Chair, Assembly Housing and Community Development Committee
1020 N Street, Room 156
Sacramento, CA 95814

RE: SB 802 (Ashby) Housing finance and development: Sacramento Area Housing and Homelessness Agency: Multifamily Housing Program: Homekey: Homeless Housing, Assistance, and Prevention program.
As Amended on June 23, 2025 – Concerns
Set for hearing July 16, 2025

Dear Assembly Member Haney:

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write to share our concerns with Senate Bill 802 by Senator Angelique Ashby. This measure would restructure and consolidate homelessness and housing funding and entities in the Sacramento region.

Addressing the homelessness crisis is a statewide concern that should be addressed through the creation of a statewide comprehensive homelessness response system. There are two fundamental barriers that continue to hinder California's efforts to make further progress on homelessness – (1) the lack of defined responsibilities for counties, cities, and the state and (2) no commitment of ongoing and dedicated homelessness funding. CSAC has been advocating to address these barriers and create such a system through the AT HOME framework.

Counties, cities, continuums of care (CoCs), and other local partners work collaboratively throughout the state to address the homelessness crisis. As part of Round 5 of the Homeless Housing, Accountability and Prevention (HHAP) program, all counties went through a six-month planning process with local partners to develop a comprehensive regional homelessness action plan that reflects a mutual agreement on how to address homelessness in that region. These plans were submitted jointly by counties, big cities, and CoCs and the HHAP Round 5 funding was only distributed within the past year. Counties are making progress to utilize this funding as efficiently and effectively as possible while also going through a similar planning process for HHAP Round 6 right now. The joint

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Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

planning process required by HHAP 5 and HHAP 6 is important and expected to yield greater results in reducing homelessness.

CSAC has concerns with the approach taken by SB 802. The bill would require the creation of a new Joint Powers Authority (JPA). The formation of this JPA will be disruptive to the utilization of HHAP funding, and the actualization of the adopted plans. It also introduces legal uncertainties related to JPA formation and CoC compliance, as well as creates a new structure for authority and decision-making around HHAP funding. All of this will create barriers and delays to providing critically needed services and programs with HHAP funding, which will hinder statewide efforts to make further progress to reduce homelessness.

SB 802 would create a new governance structure in one region that differs from the rest of the state. This would make it more difficult to create consistent and sustained program administration and progress statewide. It would also muddle the local homelessness responsibilities instead of providing clear and distinct responsibilities for cities and counties. Funding, oversight, and accountability need to be directly aligned with the local government that is directly responsible for providing those services. The newly created JPA would have authority over certain county funding streams, including some that can be used for county health and human services program responsibilities, which is inappropriate and inconsistent with county statutory obligations. This lack of clarity over responsibilities will make it more difficult to address homelessness.

Finally, this legislation would not address the fundamental barrier of providing a dedicated and ongoing funding stream to address homelessness. Counties can only make so much progress with funding that is provided one year at a time. Simply creating a new local structure will not resolve the fundamental statewide concern of not having reliable ongoing funding to address our state's homelessness crisis.

CSAC is always willing to work together to find solutions for improving our state's approach to homelessness to better serve individuals throughout the state. However, CSAC has concerns with the approach taken by SB 802. Should you have any questions regarding our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org.

Sincerely,

Justin Garrett
Senior Legislative Advocate

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

cc: The Honorable Angelique Ashby
Honorable Members and Consultants, Assembly Housing and Community Development Committee

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California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

Thursday, July 3, 2025

Commission on State Mandates
980 9th Street, Suite 300
Sacramento, CA 95814

RE: Accessibility to emergency information and services: emergency shelters: persons with pets. 24-TC-06

Dear Chair Stephenshaw and Members of the Commission on State Mandates,

The California State Association of Counties (CSAC) submits this comment letter regarding the test claim submitted by Sacramento County for Chapter 344, Statutes of 2023 (Assembly Bill 781, Maienschein). The primary purpose of CSAC is to represent county government before the California Legislature, California administrative agencies, and the federal government. This includes advocating on the value and need for county programs and services and for adequate funding to provide those services.

CSAC wishes to provide the following comments in response to the comment letter submitted by the California Department of Finance (DOF) on June 6, 2025 regarding 24-TC-06:

1. **DOF Comment: "**Finance notes the requirement to develop emergency plans stems from the discretionary decision of a city or county to form a disaster council."

    a. **CSAC Response:** This is not correct. The requirement to develop emergency plans does not stem from a local agency's decision to form a disaster council. Rather, counties, as political subdivisions of the state, are required to take action to carry out the provisions of the State Emergency Plan. California Government Code requires the Governor to coordinate and enforce the State Emergency Plan by coordinating the preparation of plans for mitigation of the effects of an emergency by the political subdivisions of the state. The Governor's Office of Emergency Services (Cal OES) is the delegated authority by the Governor to implement the State Emergency Plan and perform executive functions assigned by the Governor to support all phases of emergency management. This includes the promulgation of guidelines and assignments to state government and its

political subdivisions to support the development of California's emergency management system. As such, the State's emergency management system designates local governments—such as counties—as primarily responsible for emergency preparedness and response.

While it is discretionary that local emergency plans be developed and approved by a local disaster council, it is not discretionary for local governments to have and maintain emergency plans. The establishment of a local disaster council is one manner in which local governments take action to comply with the requirement to carry out the provisions of the State Emergency Plan. Lacking the establishment of a local disaster council does not exempt a local government from compliance with the State Emergency Act or the directives of Cal OES. The provisions of AB 781 do not specify that they pertain only to emergency plans as developed and approved by local disaster councils. Rather, AB 781 applies to any city or county emergency plan that serves to carry out the provisions of the State Emergency Plan.

The California Emergency Services Act:

i. "The State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of **each political subdivision shall take such action as may be necessary to carry out the provisions thereof**." (California Government Code Section 8568)

ii. " "Political subdivision" includes any city, city and county, county, district, or other local governmental agency or public agency authorized by law." (California Government Code Section 8557(b))

iii. " "Emergency plans" means those official and approved documents which describe the principles and methods to be applied in carrying out emergency operations or rendering mutual aid during emergencies. These plans include such elements as continuity of government, the emergency services of governmental agencies, mobilization of resources, mutual aid, and public information." (California Government Code Section 8560(a))

iv. "The Governor shall coordinate the State Emergency Plan and those programs necessary for the mitigation of the effects of an emergency in this state; and **he shall coordinate the preparation of plans and programs for the mitigation of the effects of an emergency by the political subdivisions of this state**, such plans and programs to be integrated into and coordinated with the State Emergency Plan and the plans and programs of the federal government and of other states to the fullest possible extent." (Government Code Section 8569).

v. "A county shall send a copy of its emergency plan to the Office of Emergency Services on or before March 1, 2022, and upon any update to the plan after that date." (Government Code Section 8593.3.2)

vi. "On or before July 31, 2015, the Office of Emergency Services shall update the State Emergency Plan to include proposed best practices for local governments and nongovernmental entities to use to mobilize and evacuate people with disabilities and others with access and functional needs during an emergency or natural disaster." (Government Code Section 8570.3)

2. **DOF Comment: "**Finance further notes it is not aware of any statutory requirement for a local government to operate an emergency shelter, except for requirements that are downstream from the discretionary decision to create a disaster council."

    a. **CSAC Response:** As established above, counties, as political subdivisions of the state, are required to take action to carry out the provisions of the State Emergency Plan. Compliance with the State Emergency Plan includes myriad requirements for accessibility to emergency information and services for the functional needs population pursuant to Government Code Article 6.5 (Sections 8593 to 8594.16). This includes a requirement for counties, upon the next update to their emergency plans, to integrate functional needs into their emergency planning by addressing how the functional needs population is served by emergency sheltering (Government Code Section 8593.3). It is from this requirement that counties are mandated to integrate many components of accessibility into their emergency plans, as follows:

i. "A county, including a city and county, shall, upon the next update to its emergency plan, integrate access and functional needs into its emergency plan by addressing, at a minimum, how the access and functional needs population is being served by the following…Emergency sheltering," (Government Code Section 8593.3)

ii. "Upon the next update of a city or county's emergency plan: A county shall update its emergency plan to designate emergency shelters able to accommodate persons with pets." (Government Code Section 8593.10(b)(1) and 8593.10(b)(1)(A))

iii. "A county, including a city and county, shall, upon the next update to its emergency plan, integrate cultural competence into its emergency plan by addressing, at a minimum, how culturally diverse communities within its jurisdiction are served by the following…Emergency evacuation and sheltering." (Government Code Section 8593.3.5(a) and 8593.3.5(a)(2)).

CSAC urges the Commission to recognize that local emergency planning, local maintenance of emergency plans, and local compliance with the State Emergency Plan are not discretionary in nature. We encourage the Commission to evaluate test claim 24-TC-06 with the establishment that counties, as political subdivisions of the state, are required to carry out the State Emergency Plan, including accessibility and functional requirements pursuant to Government Code Article 6.5.

Thank you for your consideration of our comments.

Respectfully submitted,

Jacqueline Wong-Hernandez
Chief Policy Officer

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

August 1, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
1020 O Street, Suite 7620
Sacramento, CA 95814

RE: AB 265 (Caloza) Small Business and Nonprofit Recovery Fund Act
As amended on June 26, 2025 – SUPPORT
To be heard in the Senate Appropriations Committee on August 18, 2025

Dear Senator Caballero,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of Assembly Bill 265 (Caloza). This bill would establish the Small Business and Nonprofit Recovery Fund Act to support small businesses and nonprofit organizations impacted by declared states of emergencies.

California is home to over 4 million small businesses that employ nearly half of California's workforce. Those whose livelihoods depend on the success of a small business are disproportionately impacted when there is a disaster. In recent years, California has experienced an increasing frequency and intensity of disasters, including wildfires, droughts, floods, and public health emergencies. Each disaster disrupts entire communities and causes significant operational and financial disruptions to small businesses and nonprofit organizations.

Small businesses are the backbone of our economy—creating jobs, sparking innovation, and generating vital tax revenue that funds essential public services. AB 265 aims to support small businesses and nonprofit organizations impacted by disasters, helping them with recovery and rebuilding efforts and supporting investments in resilient infrastructure. Upon appropriation by the Legislature, this bill allocates 90 percent to a competitive grant program that provides financial support to eligible small businesses and nonprofit organizations. The remaining 10 percent is designated for small business technical assistance centers and the Capital Infusion Program to provide support to small businesses in disaster-affected areas. This targeted support is important to help communities recover and rebuild stronger.

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Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

For these reasons, we are pleased to support AB 265. Should you have any questions regarding our position, please do not hesitate to contact me at ejungwirth@counties.org.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate, CSAC

CC : The Honorable Jessica Caloza, California State Assembly
Members and Consultants, Senate Appropriations Committee
Mark McKenzie, Staff Director, Senate Appropriations Committee
Kirk Feely, Fiscal Director, Senate Republican Caucus

URBAN COUNTIES OF CALIFORNIA
CSAC
RCRC
LEAGUE OF CALIFORNIA CITIES
CSDA
ACHD
ASSOCIATION OF CALIFORNIA HEALTHCARE DISTRICTS
CHEAC
Improving the Health of all Californians
ACEC
American Council of Engineering Companies
California
PRISM
Public Risk Innovation, Solutions, and Management
ACWA
Association of California Water Agencies
COUNTY OF SAN MATEO CALIFORNIA
THE SEAL OF CONTRA COSTA COUNTY CALIFORNIA
THE COUNTY OF SANTA CLARA 1850
MERCED COUNTY 18 55
COUNTY OF Placer
AIA California
COUNTY OF SACRAMENTO CALIFORNIA
SAN JOAQUIN COUNTY
CALIFORNIA BUILDING OFFICIALS
SSJID 115
SOUTH SAN JOAQUIN IRRIGATION DISTRICT
115 YEARS OF SERVICE
COUNTY OF LAKE STATE OF CALIFORNIA
THE COUNTY OF FRESNO 1856
COUNTY OF RIVERSIDE MAY 9, 1893
Transportation CALIFORNIA
CalGeo
The California Geotechnical Engineering Association
CARPD
California Association of Recreation and Park Districts
CELSA
CaliforniaTransit Association
CASA
Helix
WATER DISTRICT
CAPH
CALIFORNIA ASSOCIATION OF PUBLIC HOSPITALS & HEALTH SYSTEMS
Bay Area Air District
CalAnimals
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SAN BERNARDINO COUNTY
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ASCE
AMERICAN SOCIETY OF CIVIL ENGINEERS
REGION 9
cprs
advancing california's park & recreation profession
VALLEY CENTER MUNICIPAL WATER DISTRICT
Water Conservation / A Way of Life
COUNTY OF LOS ANGELES CALIFORNIA
WATER DISTRICT
COACHELLA VALLEY WATER DISTRICT
ELSINORE VALLEY
MUNICIPAL WATER DISTRICT
ESTABLISHED 1956
OTAY
WATER DISTRICT
OLIVENHAIN
Municipal Water District
VID
VISTA IRRIGATION DISTRICT
Conejo
Recreation & Park District
West Valley Water District
SACRAMENTO AREA SEWER DISTRICT
CAJPA
California Association of Joint Powers Authorities
AGC CALIFORNIA
THE ASSOCIATED GENERAL CONTRACTORS OF AMERICA
Tahoe City Public Utility District

July 30, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
1021 O Street, Suite 7620
Sacramento, CA 95814

Re: **AB 339 (Ortega): Local public employee organizations: notice requirements**
As amended 7/15/25 – OPPOSE
Set for hearing 8/18/25 – Senate Appropriations Committee

Dear Senator Caballero:

On behalf of the Urban Counties of California (UCC), California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Association of California Healthcare Districts (ACHD), California Special Districts Association (CSDA), League of California Cities (CalCities), Public Risk Innovation, Solutions, and Management (PRISM), Association of California Water Agencies (ACWA), County Health Executives Association of California (CHEAC), California State Sheriffs' Association (CSSA), Contra Costa County, Fresno County, Lake County, Los Angeles County, Merced County, Placer County, Riverside County, Sacramento County, San Joaquin County, San Mateo County, Santa Clara County, San Bernardino County, Ventura County, South San Joaquin Irrigation District, American Council of Engineering Companies of California, California Geotechnical Engineering Association (CalGeo), the American Institute of Architects California, Transportation California, California Building Officials (CALBO), California Association of Recreation and Park Districts (CARPD), California Transit Association, California Association of Sanitation Agencies (CASA), the California and Nevada Civil Engineers and Land Surveyors Association (CELSA), Helix Water District, the California Association of Public Hospitals and Health Systems (CAPH), California Animal Welfare Association (CalAnimals), Bay Area Air District, California-Nevada Section, American Water Works Association (CA-NV AWWA), the Jurupa Community Services District, the American Public Works Association – California Chapters, the California Park and Recreation Society (CPRS), Contra Costa Water District, and the American Society of Civil Engineers (ASCE)-Region 9, Coachella Valley Water District, the California Association of Joint Powers Authorities (CAJPA), West Valley Water District, Olivenhain Municipal Water District, Valley Center Municipal Water District, Otay Water District, Vista Irrigation District, Tahoe City Public Utility District, Hayward Area Recreation and Park District, Conejo Recreation and Park District, Sacramento Area Sewer District, Elsinore Valley Municipal Water District, and the Association of General Contractors, we write in respectful opposition to Assembly Bill 339, as recently amended. This measure would require the governing body of a local public agency (non-school) to provide written notice to the employee organization no less than 60 days prior to issuing any request for proposals, request for quotes, or renewing or extending an existing contract to perform services that are within the scope of work of the job classifications represented by the recognized employee organization, and to engage in potentially extensive and lengthy negotiations regarding each of those actions upon request. AB 339 would be impractical in its execution, is unworkable for ensuring provision of public services, and undermines local labor negotiations. In addition, and importantly for your committee, AB 339 imposes significant costs to local agencies, including new noticing requirements, extended labor negotiations, and likely delays in services and projects.

AB 339 applies to ***any*** contract that is within the scope of work of any job classification represented by a recognized employee organization; for local agencies with represented workforces, this essentially means nearly every contract would be subject to notice and possible meet and confer. This provision is considerably broader than the existing requirement for bargaining under the Meyers-Milias Brown Act (MMBA); under existing law, where contracting out is legally permissible, local agencies are still required to "meet and confer in good faith" with any affected bargaining unit prior to making any decision ***that is within the scope of representation***. (Gov. Code, §§ 3505.) However, existing law incorporates several common-sense limitations upon the requirement to meet and confer – including where there is a longstanding past practice of contracting for particular services, or where contracting out is contemplated in the applicable MOU. AB 339 subverts these well-settled principles to the detriment of local public services by expanding opportunities for meet and confer negotiations, which – in addition to the bill's notification requirements – will expose local agencies to additional costs that result from a new and potentially significant workload increase. AB 339 may even impact the ability of local agencies to contract with the state for cooperative service provision.

It is important to note that an administrative remedy is already available to recognized employee organizations when they believe that a local agency has neglected to meet existing notification and meet and confer requirements regarding contracting. Failure to adhere to existing requirements under the MMBA and related case law subjects a local agency to a potential unfair labor practice charge at the Public Employment Relations Board (PERB).

The lack of definition of emergency or exigent circumstances in AB 339 undermines existing emergency contracting authority; further, this provision only applies to the initial notice requirement – not the meet and confer provisions – making the provision nearly meaningless in an emergency circumstance. You are undoubtedly aware of the considerable responsibility assumed by local agencies in a natural disaster, public health emergency, or other local crisis. As first responders, local agencies rely on existing statutes that allow for considerable flexibility to ensure the safety and well-being of our communities. Again, AB 339 would prove costly for local agencies attempting to focus available resources on response and recovery during an emergency.

In addition, AB 339 will significantly delay public works projects and could grind building permit processing, design, and construction of needed housing or infrastructure projects to a halt. Public works projects involve multiple phases of design, which require a diverse array of services that cannot be fully known until earlier phases have been completed, making it impossible for agencies to complete all of AB 339's notification pauses at the outset of a project. These notices would therefore be compounded, causing projects to be delayed by multiples of the 60-day pause before a shovel ever touches the ground. Since the bill applies to ***any***.services within the scope of work of the job classifications represented by the recognized employee organization, this will include instances in which none of an agency's employees currently, or ever, have performed those services. The vast majority of agencies lack the resources and expertise to have 100 percent of their design needs performed by its own engineers, planners, and other design professionals on staff. Should one of these agencies need to transfer responsibility for conducting vital design services – plan checking an application for a housing development permit, for example – could leave the agencies without qualified professional staff to perform those essential functions for at least 60 days. This may expose agencies to legal liability for failing to meet statutory deadlines or regulatory obligations as agencies could be barred from hiring expertise in time due to the 60—day pause. Recent amendments to AB 339 do not fully resolve these concerns.

The bill also deters local agencies from working in partnership with local community organizations, who are at the front lines of providing critical local services, and who are already under scrutiny by the federal government, adding considerable uncertainty to their ongoing financial viability. We value our partnerships with these organizations, as they often provide culturally competent outreach and direct services to groups that can be difficult to serve; these partnerships allow local agencies to maximize federal, state, and local resources to ensure that services reach those who need them most.

Finally, sponsors continue to assert that documents associated with a Request for Proposals (RFP), Request for Quotes (RFQ), contract extensions, and contract renewals are not disclosed to the public. In truth, RFPs and RFQs are typically public by nature and subject to competitive bidding processes and regulations, while contracts are almost always disclosable public records under the Public Records Act. ***We dispute that local agencies are inappropriately withholding public records and further disagree that local agencies are failing to comply with existing notification requirements under the MMBA. If either were true, there are already existing remedies for sponsors to address these issues.***

Like previous unsuccessful proposals that have sought to undermine local agencies' ability to contract for public services, AB 339 represents a sweeping change to the fundamental work of local governments, but we remain unaware of a specific, current, and widespread problem that this measure would resolve or prevent. We are keenly aware, though, of the very real harm that could result from this measure. AB 339 will not improve services, reduce costs, or protect employees. As a result, we are opposed. Should you have any questions about our position, please reach out directly.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

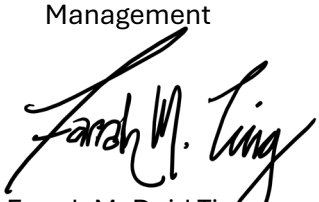
Sarah Dukett
Policy Advocate
Rural County Representatives of California

Sarah Bridge
Legislative Advocate
Association of California Healthcare Districts

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Johnnie Pina
Legislative Affairs, Lobbyist
League of California Cities

Jason Schmelzer
Legislative Advocate
Public Risk Innovation, Solutions, and Management

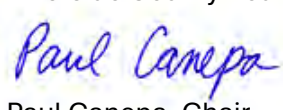


Farrah McDaid Ting
Deputy Director of Policy
County Health Executives Association of California

Candace Andersen, Chair
Contra Costa County Board of Supervisors

Joshua Pedrozo, Chairman
Merced County Board of Supervisors

Supervisor V. Manuel Perez, Chair
Riverside County Board of Supervisors



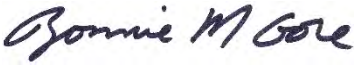
Paul Canepa, Chair
San Joaquin County Board of Supervisors

Erin Evans-Fudem
Legislative Deputy County Counsel
Office of the County Counsel
County of Santa Clara

Julia Bishop Hall
Director of State Legislative Relations
Association of California Water Agencies

Cory M. Salzillo
Legislative Director
California State Sheriffs' Association

Susan Parker, County Administrative Officer
County of Lake



Bonnie Gore, Chair (District 1)
Placer County Board of Supervisors

Elisia De Bord
Governmental Relations and Legislative Officer
County of Sacramento

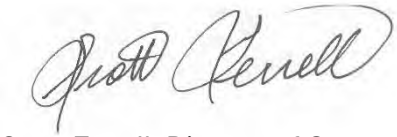
Connie Juárez-Diroll
Chief Legislative Officer
County of San Mateo

Eric P. Angstadt
CELSA
Executive Secretary

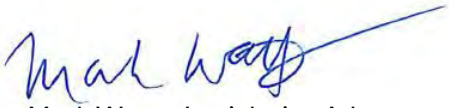
Peter M. Rietkerk, General Manager
South San Joaquin Irrigation District

Tyler Munzing, Director of Government Affairs
American Council of Engineering Companies of California

Noah Smith, PE, GE, President
California Geotechnical Engineering Association

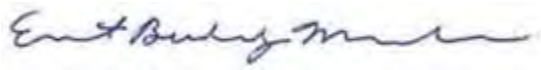


Scott Terrell, Director of Government Relations
The American Institute of Architects California

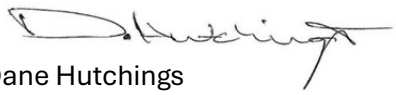


Mark Watts, Legislative Advocate
Transportation California

Matthew Wheeler, DPPD, Executive Director
California Building Officials (CALBO)



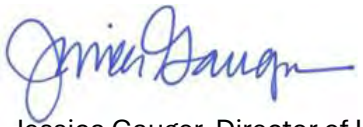
Buddy Mendes, Chairman
Fresno County Board of Supervisors



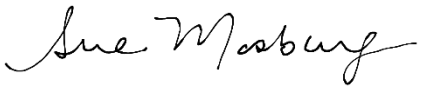
Dane Hutchings
Legislative Representative
California Association of Recreation and Park Districts

Michael Pimentel, Executive Director
California Transit Association

Dawn Rowe, Chairman
County of San Bernardino

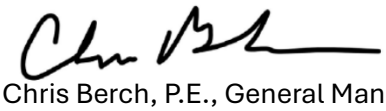


Jessica Gauger, Director of Legislative Advocacy & Public Affairs
California Association of Sanitation Agencies



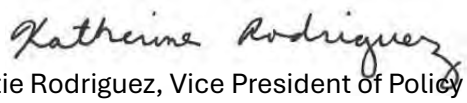
Sue Mosburg, Executive Director
American Water Works Association, California-Nevada Section

Brian Olney, General Manager
Helix Water District



Chris Berch, P.E., General Manager
Jurupa Community Services District

Karen Lange, Legislative Advocate
California Animal Welfare Association



Katie Rodriguez, Vice President of Policy and Government Relations
California Association of Public Hospitals and Health Systems (CAPH)

Philip M. Fine, Ph.D.
Executive Officer/APCO
Bay Area Air District

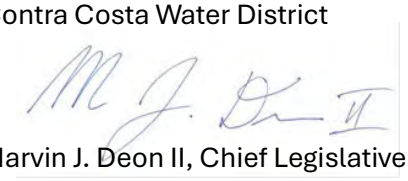
Joubin Pakpour
Director
American Public Works Association — California Chapters

Elizabeth Espinosa
Legislative Advocate
County of Ventura

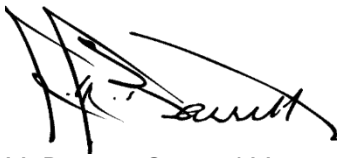
Stephanie Stephens
Exeuctive Director
California Park and Recreation Society

Ernesto A. Avila, Board President
Contra Costa Water District

Yazdan Emrani, Region 9 Director
American Society of Civil Engineers (ASCE-Region 9



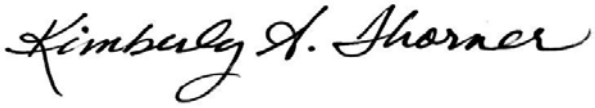
Marvin J. Deon II, Chief Legislative Representative
County of Los Angeles



J.M. Barrett, General Manager
Coachella Valley Water District

Faith Borges, Legislative Advocate
California Association of Joint Powers Authorities (CAJPA)

John Thiel, General Manager
West Valley Water District

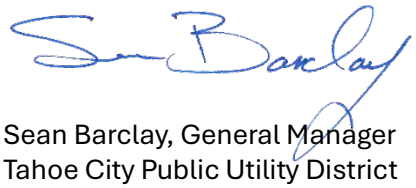


Kimberly A. Thorner, General Manager
Olivenhain Municipal Water District

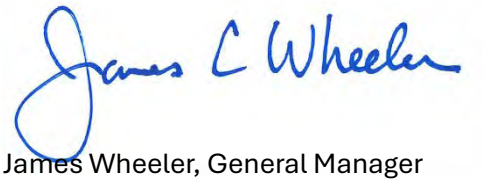
Gary Arant, General Manager
Valley Center Municipal Water District

Jose Martinez, General Manager
Otay Water District

Brett Hodgkiss, General Manager
Vista Irrigation District



Sean Barclay, General Manager
Tahoe City Public Utility District



James Wheeler, General Manager
Hayward Area Recreation and Park District

Jim Friedl, General Manager
Conejo Recreation and Park District

Jofil Borja, Environmental Legislative and
Regulatory Affairs Manager
Sacramento Area Sewer District

Greg Thomas, General Manager
Elsinore Valley Municipal Water District

Chris O'Connor, Senior Vice President,
Government & Industry Affairs
Associated General Contractors

cc: Members and Consultants, Senate Appropriations Committee
The Honorable Liz Ortega, California State Assembly

August 6, 2025
The Honorable Anna Caballero
Chair, Senate Judiciary Committee
1021 O Street, Room 412
Sacramento, CA 95814

RE: **AB 340 (Ahrens) Employer-Employee Relations Confidential Communications.**
OPPOSE *(As Amended March 5, 2025)*

Dear Senator Caballero,

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), the Association of California Healthcare Districts (ACHD), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Association of Joint Powers Authorities (CAJPA), Public Risk Innovation, Solutions, and Management (PRISM), the California Association of School Business Officials (CASBO), the California

Association of Recreation and Park Districts (CARPD), California County Superintendents, the School Employers Association of California (SEAC), Small School Districts' Association (SSDA), Community College League of California, Schools Excess Liability Fund (SELF), and the University of California, write in respectful opposition to Assembly Bill (AB) 340. This bill would restrict an employer's ability to conduct internal investigations to the detriment of employees' and the public's safety and well-being, adding new costs and liability for public employers. Moreover, the substantive provisions of the bill create restrictions mirroring a privilege.

Previous Legislation and Previous Veto
Our concerns with AB 340 are consistent with the issues raised in response to previously introduced legislation, AB 2421 (Low, 2024), AB 729 (Hernandez, 2013), AB 3121 (Kalra, 2018) and AB 418 (Kalra, 2019). The issues are succinctly captured in the AB 729 veto message from Governor Brown, which states: "I don't believe it is appropriate to put communications with a union agent on equal footing with communications with one's spouse, priest, physician or attorney. Moreover, this bill could compromise the ability of employers to conduct investigations into workplace safety, harassment and other allegations."

New Costs and Added Liability for the State, Local Governments, and Schools
In order to conduct proper investigations that uphold the public's trust, protect against the misuse of public funds, and ensure the safety and well-being of both public employees and the public at large, it is critical that a public employer has the ability to interview all individuals with relevant information to ascertain the facts and understand the matter fully. AB 340 would increase investigation and litigation costs for the state as well as local governments and schools by creating incomplete investigations, since all appropriate employees with relevant information cannot be questioned. Costs and risks may also increase as conduct challenged as unlawful under the bill's provisions is adjudicated before the Public Employment Relations Board (PERB). Even for conduct that is not brought to PERB, AB 340 could lead to unknown and unbudgeted costs for the state, and costs to local governments and schools, for dispute resolution, attorney fees, arbitration, and other costs. In addition to legal costs, AB 340 could force the state, local agencies, and schools to review and, in some cases, update collective bargaining agreements and policies regarding workplace investigations and allowable communications between represented employees and their employer. For schools, this is a drain of Proposition 98 funding.

Inconsistent with PERB Decision
AB 340 states that its prohibition on employer questioning is intended to be consistent with, and not in conflict with, William S. Hart Union High School District (2018) PERB Dec. No. 2595. This is problematic for two reasons. First, the bill is not consistent with that PERB decision. That decision engaged in a circumstantial analysis to determine whether employer questioning related to a disciplinary investigation was prohibited or not, while weighing the employee's and the employer's interests. The bright line standard in the opinion was narrow in scope. AB 340 goes beyond that, forgoing any circumstantial analysis or weighing of interests, and exceeding the scope of any standards articulated by the decision. Second, we are not aware of evidence that PERB is denying the interests of employees on this issue, raising the question of whether a legislative solution is warranted.

Expansion of New One-Sided Standard
AB 340 would create a de facto prohibition on employers requesting a court to compel disclosure of purportedly confidential communications, which is the same

outcome as if the communication was privileged in those circumstances. This will have a significant impact on judicial and administrative proceedings.

Endangers Workplace Safety
AB 340 interferes with the ability to interview witnesses because it would prohibit public agencies from questioning any employee or "representative of a recognized employee organization, or an exclusive representative" about communications made in confidence between an employee and a "representative of a recognized employee organization, or an exclusive representative" in connection with representation relating to any matter within the scope of representation. While AB 340 includes a narrow exception for criminal investigations, and provides that it does not supersede Gov. Code 3303, many necessary investigations are still subject to the bill's limitations, putting safety at risk.

This bill would hinder employees who wish to voluntarily report information or testify in front of necessary misconduct investigations since an employer would be prohibited from certain lines of questioning. It would also limit the ability of public employers to carry out the requirements of recently enacted law, Senate Bill 553 (Cortese, 2023), which includes conducting investigations into workplace safety, harassment, and other allegations. As of January 1, 2025, SB 553 allows collective bargaining representatives standing to seek temporary restraining orders (TRO) in connection with workplace violence. AB 340 will create a problematic scenario wherein a TRO may be obtained but an employer could not fully investigate the underlying facts. AB 340 lacks guardrails to prevent potential conflicts of interest that could arise during employee safety issues.

Specific to local educational agencies, TROs are being sought by teachers and classroom aides against students with a disability, who may not have full control of their motor skills or have a cognitive impairment. School employers shared that their ability to gather details and intercede results in alternatives to a TRO that are more productive for their staff and students. Otherwise, school employers may be exposed to greater liability as they try to adhere to contractual agreements for a student's Individualized Educational Plan.

Administrative investigations are also critical tools for public agency employers when protecting minors under the supervision and care of their employees. As it relates to preventing childhood sexual assault and misconduct, perpetrators are not often caught in the act at a school site or facility but rather discovered through investigations conducted by the employer through either building evidence for what may lead to a criminal investigation or removing an employee before misconduct may occur. The current liability statewide for school employers alone is approximately $3 billion dollars and districts need every tool available to prevent future misconduct.

AB 340, as drafted, would tie the hands of school employers in seeking better options for student educational outcomes and taking proactive steps for general safety.

Making matters worse, employers may not even know they are acting contrary to AB 340's restrictions by communicating with staff, because only the employee or the representative would know or could decide when a communication was made "in confidence." This bill prohibits the asking of questions, without regard to an employer's prior knowledge that a specific question is prohibited by the bill. There is no requirement that a labor union or employee invoke AB 340 prior to alleging a violation. This could affect day-to-day activities and critical government operations.

For the reasons discussed above, the organizations listed below are respectfully

opposed to AB 340. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
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Eric Lawyer
Senior Legislative
Advocate
California State Association of Counties
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Solutions, and Management (PRISM)
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Mario Guerrero
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University of California
State Governmental Relations
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CC:

The Honorable Patrick Ahrens
Honorable Members, Senate Appropriations Committee
Robert Ingenito, Principal Consultant, Senate Appropriations Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

July 30, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
1020 O Street, Suite 7620
Sacramento, CA 95814

Re: **AB 418 (Wilson): Property taxation: tax-defaulted property**
As amended 3/17/25 – SUPPORT
Set for hearing 8/18/25 – Senate Appropriations Committee

Dear Senator Caballero:

On behalf of the Urban Counties of California (UCC), the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC), we write to express our support for Assembly Bill 418 by Assembly Member Lori Wilson, a measure that preserves the ability of California counties to utilize Chapter 8 sales of tax-defaulted properties. These sales are used to dispose of challenging properties or to facilitate the development of affordable housing or other local agency uses; AB 418 ensures that the owners of such properties are able to participate in an administrative process if they disagree with the tax sale value established by the tax collector and proposed for approval by the Board of Supervisors.

This important measure seeks to address the 2023 Supreme Court decision *Tyler v Hennepin County, Minnesota*, in which the plaintiff's constitutional rights were violated when Hennepin County auctioned her tax-defaulted property to satisfy the delinquent property tax debt of $15,000. The property sold for $40,000 and the County kept the remaining $25,000 in excess proceeds without first affording the plaintiff the opportunity to file a claim for the excess proceeds. The Court found that the taking of the excess proceeds violated the Takings Clause of the Fifth and Fourteenth Amendments and the Excessive Fines Clause of the Eighth Amendment.

Unlike the laws in Minnesota, California's laws require that if a property is sold at a tax auction, any proceeds from the auction that remain after all delinquencies are paid are then made available to parties of interest (i.e. the owner) of that property, and those parties have one year to file a claim for those excess proceeds. Under current law, a county is prohibited from depriving a property owner of their excess proceeds without first

providing public notice and certified mailing to the last known address, notifying the owner of the existence of excess proceeds and of the one-year timeframe to file a claim.

In California, there are thousands of tax-defaulted properties that hold little to no value or otherwise present specific or unusual challenges to dispose of through a traditional tax auction. Using a Chapter 8 tax sale process to dispose of such properties can make the most sense for the local agency and for the property owner. AB 418 outlines a procedure by which California's county tax collectors will utilize during the Chapter 8 sale process to ensure that the property is disposed of in a manner that is transparent and affords property owners an administrative remedy if the property owner disputes the price set at a Chapter 8 tax sale. These additional steps, which include a hearing before the Board of Supervisors where a party of interest may present evidence to dispute the tax sale price, offers an administrative process for property owners, while preserving the tax collector's informed discretion to utilize available options to manage those properties for which appraisals are not financially feasible.

AB 418 ensures that counties can effectively conduct Chapter 8 sales without the threat of litigation and Public Records Act requests that have recently been associated with these sales. The bill not only contains costs at the county level but ensures the fair collection and allocation of taxes for all local taxing entities. As a result, our associations strongly support this measure to address the uncertainty that currently exists and resolve this issue in a manner that ensures fairness and efficiency.

We respectfully urge your "aye" vote on AB 418.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

Sarah Dukett
Policy Advocate
Rural County Representatives of California

cc: Members and Consultants, Appropriations Committee

The Honorable Lori Wilson, California State Assembly

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 11, 2025

The Honorable Chris Rogers
Member, California State Assembly
1021 O Street, Room 5130
Sacramento, CA 95814

RE: AB 531 (Rogers) Geothermal powerplants and projects: certification and environmental review.
As amended on July 7, 2025 – Notice of OPPOSITION

Dear Assemblymember Rogers,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in **opposition** of AB 531, which would expand the California Energy Commission's (CEC) AB 205 opt-in permitting process to include geothermal powerplants of any size, in lieu of permitting by local agencies.

AB 205 (2022) allowed for a major shift of local authority for siting clean and renewable energy projects to the CEC until June 30, 2029. The CEC permit is in lieu of any permit that would normally be required by the local land use authority and most state permits, and the permitting process allows the CEC to bypass local standards and ordinances. These facilities can have enormous impacts on local communities, even when the benefits are spread to other parts of the state.

Local governments have the perspective to, when necessary, mitigate impacts of projects and balance out competing land uses. Counties work closely with energy developers to site facilities and appropriately balance the needs of the community. Eliminating local review of these projects creates potentially significant and disruptive land use conflicts. AB 531 would exacerbate this unnecessary usurpation of local authority by expanding the types of projects included in the opt-in permitting program.

For these reasons, we must respectfully **oppose** AB 531. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Sincerely,

Jordan Wells
Legislative Advocate
California State Association of Counties

July 17, 2025

Senator Anna Caballero
Chair, Senate Committee on Appropriations
State Capitol, Room 412
Sacramento, CA 95814

RE: AB 690 (Schultz) Criminal procedure: indigent defense compensation
As amended on May 23, 2025 – OPPOSE.
Senate Appropriations Committee Suspense File

Dear Chair Caballero,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we write in respectful opposition to Assembly Bill (AB) 690 (Schultz). While we share the overarching policy intent, this bill would create additional mandates for the provision of indigent defense services, which will result in increased, unknown, but significant cost pressures to counties statewide.

The California and U.S. Constitution enshrine the right to effective assistance of legal counsel and equal protection through due process for all criminal defendants, prior to being deprived of their liberty. Thus, the government is required to provide access to attorneys and pay for the cost of representation for those who cannot afford counsel. In California, the state has delegated to counties the responsibility of both funding and administering indigent defense services at the trial court level. Counties have the authority and flexibility to design systems that best suit local needs. However, California is only one of four states that does not provide full or partial funding to counties for the delivery of the constitutionally promised service. Despite the fact that the state has shifted the primary responsibility to provide indigent defense to counties, in 2020, a California Superior Court determined that the state still has a responsibility to fulfill its constitutional duties. Although the provisions in AB 690 seek to improve the quality of criminal defense in California, the state's responsibility in helping ensure that this goal is met is absent.

As drafted, AB 690 makes four main changes, which will inevitably have a fiscal impact on counties:

First, this measure would require counties to adhere to recently published standards drafted by the Office of the State Public Defender (OSPD), whose mission is to provide support and technical assistance to counties, rather than develop rules on how county government administers indigent defense services. The ten new standards impose vast changes around leadership, organizational structure, classification of attorneys, defense panel procedures, program oversight and guidance, training and attorney development, data collection, access to resources, attorney compensation, and attorney-client communication. Not all counties are equipped with the resources to meet the stringent and comprehensive strategies absent state investments.

Second, this bill would establish several expansive new requirements counties must incorporate into any contractual agreement with private firms and non-county attorneys. This includes, but is not limited to, access to funding for ancillary services on top of general attorney compensation – investigators, social workers, immigration counsel, as well as payment for paralegals, case support services, and mitigation specialists, which – in our view – should be accounted for as part of standard operating costs for private contractors. Again, without state support, this will increase county general fund costs for the provision of a state mandated service.

Third, and arguably one of the most critical provisions of this measure is the establishment of a blanket prohibition on the utilization of flat fee or per-case compensation models when contracting out or administering indigent defense services. This aspect of the measure would have an immediate and direct impact, particularly in the hardest to serve areas of our state, where it is increasingly difficult to recruit and retain experienced criminal defense counsel. For example, in counties where a flat fee contract model is utilized, attorneys express support for the security it provides during periods when there may be a declining caseload. Simply put, the flat fee prohibition reduces county-by-county flexibility and poses additional challenges to the already shrinking pool of qualified defense attorneys. As currently drafted, the bill fails to identify practical and alternative models that would meet the fiscal restrictions of any given county, nor does it demonstrate that alternative models will automatically yield higher quality defense and a return on the higher investment necessary to recruit and retain qualified attorneys.

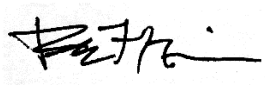
Lastly, this measure would require biannual reporting of every single county contract for indigent defense services to the OSPD, again, without new resources or state funding.

Overall, the combined provisions in AB 690 dramatically reduce county authority over the constitutionally mandated service that the state has delegated to counties, without any meaningful funding. The requirements are not only costly, but some are simply not feasible due to the diverse challenges facing our 58 unique counties with regards to population, geography, crime trends, workforce shortages, and budgetary constraints.

While counties share the underlying intent of AB 690 – to ensure there are manageable caseloads for defense attorneys and high-quality representation for all clients statewide – the bill imposes considerable changes that must be funded through the Legislature prior to counties being able to make the necessary contractual and system-wide changes that this measure would demand. Ultimately, when many of our counties are struggling to sustain critical programming and ensuring the continued delivery of essential services for our most vulnerable communities, now is not the time to pass additional unfunded mandates.

For these reasons, CSAC, UCC and RCRC regretfully oppose AB 690. Should you have any questions regarding our position, please do not hesitate to contact us at rmorimune@counties.org, ehe@hbeadvocacy.com, or sdukett@rcrcnet.org.

Sincerely,



Ryan Morimune	Elizabeth Espinosa	Sarah Dukett
Senior Legislative Advocate, CSAC	Legislative Advocate, UCC	Policy Advocate, RCRC

CC: Members and Consultants, Senate Committee on Appropriations
The Honorable Nick Schultz, California State Assembly

August 13, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

Re: **AB 699 (Stefani): Elections: local tax measures.**
As amended July 3, 2025 - SUPPORT
Set to be heard in Senate Appropriations Committee on August 18, 2025

Dear Senator Caballero:

On behalf of the California State Association of Counties and the Urban Counties of California, we write to express our support for Assembly Bill (AB) 699, which will allow election officials to refer voters to the Voter Information Guide for detailed tax rate information rather than requiring the lengthy tax rate information to appear directly on the ballot. This would increase transparency by giving more information to voters for local bond and tiered-rate tax measures.

Current law requires counties to include very specific financial and technical information in each 75-word ballot label, including the amount of money to be raised annually by the tax and the rate and duration of the tax. However, the 75-word limit can be too restrictive for accurately and clearly summarizing complex tax and bond measures, which can lead to voter confusion and misinterpretation of the proposals.

AB 699 would improve ballot transparency for local bond and tax measures, giving voters more information about how the measures would affect their taxes. The provisions of this bill would allow local agencies to do this by directing voters to the

county voter information guide and then providing detailed information about the measure's effects on taxes in the voter guide.

This bill would not only give local agencies the alternative to remove the confusing language currently required, it would give them the opportunity to provide more, and clearer, information in the voter guide so voters can make informed decisions.

For these reasons, we are proud to support AB 699 and respectfully request an AYE vote. Should you have any questions about our position, please do not hesitate to contact us.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

CC: The Honorable Catherine Stefani
Members and Consultants, Senate Appropriations Committee
Robert Ingenito, Consultant, Senate Appropriations Committee
Cory Botts, Consultant, Republican Caucus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 9, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, 412
Sacramento, CA 95814

RE: Support for AB 859 (Macedo) – Civil Procedure: recovery of defense costs.
As Introduced February 19, 2025 – SUPPORT
Heard in Senate Appropriations Committee – July 7, 2025

Dear Senator Caballero,

I am writing on behalf of the California State Association of Counties (CSAC) to express support for **AB 859 (Macedo),** which would allow counties to recoup legal costs from defending meritless lawsuits.

Existing law does not allow defendants to recover legal costs when they file for a demurrer and get dismissed from a lawsuit. Counties and other government entities often face lawsuits where they are improperly named as defendants, requiring them to allocate significant funds to legal defenses. Local governments waste precious taxpayer dollars on lawsuits that they should not be named on.

AB 859 (Macedo) offers a commonsense solution by allowing local governments to recover the legal costs incurred when they file for a demur and are subsequently dismissed from a lawsuit. Allowing cost recovery when a demur is granted will help discourage the filing of frivolous lawsuits and ensure taxpayer dollars are directed toward essential community services.

CSAC supports AB 859 (Macedo), because it will reduce legal costs to local governments, save taxpayer dollars, and promote more efficient use of local resources.

For these reasons, CSAC respectfully requests an "AYE" vote on AB 859 (Macedo). Thank you for your time and consideration.

Sincerely,

Eric Lawyer
Legislative Advocate

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

California State Association of Counties
elawyer@counties.org

Cc: The Honorable Alexandra Macedo, Member of the California State Assembly
Members and Staff, Senate Appropriations Committee
Morgan Branch, Consultant, Senate Republican Caucus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 17, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: AB 993 (Hadwick) Hazardous materials management: Rural CUPA Reimbursement Account.
As amended on May 23, 2025 – Notice of SUPPORT
To be heard in the Senate Appropriations Committee

Dear Chair Caballero,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of AB 993 (Hadwick), which would expand eligibility for funding from the Rural Certified Unified Program Agency (CUPA) Reimbursement Account.

CUPAs are local agencies tasked with implementing and enforcing California's Unified Program, a consolidation of six environmental and emergency management programs that protect Californians from hazardous materials and hazardous waste. In 2000, the Legislature created the Rural CUPA Reimbursement Program with the passage of SB 1824 (Kelley). While 13 counties are currently eligible for funding from the Account, 12 additional counties meet the population threshold but are ineligible because their CUPAs were certified before January 1, 2000. According to the Unified Program Administrative and Advisory Group's 2022-2027 Strategic Plan, one key performance indicator/target is the expansion of the Rural Reimbursement grants by 2027.

AB 993 would make every county with a population of less than 150,000 eligible for this funding, regardless of the date of certification. For these reasons, CSAC supports AB 993. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

Sincerely,

Jordan Wells

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

Legislative Advocate
California State Association of Counties

CC : The Honorable Heather Hadwick, Member of the California State Assembly
Members and Staff, Senate Appropriations Committee

August 15, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: AB 1018 (Bauer-Kahan) Automated decision systems.
As amended on July 17, 2025 – Notice of OPPOSITION
To be heard in the Senate Appropriations Committee on August 18, 2025

Dear Senator Caballero,

On behalf of the California State Association of Counties (CSAC) and the Urban Counties of California (UCC), we write in respectful opposition to Assembly Bill (AB) 1018, which would regulate the development and deployment, by both the public and private sector, of automated decision systems (ADS) that are designed or used to make or facilitate consequential decisions. While we understand the intent to promote fairness and transparency in the use of these technologies, AB 1018 imposes significant operational and financial burdens on counties that could hinder our ability to deliver essential services to California residents.

Broad Scope Raises Implementation Concerns
The broad definitions used in AB 1018 could encompass routine administrative tools used in everyday county operations, including tools for hiring and pre-employment testing, employee scheduling and training and development, property appraisals, planning and permitting reviews, and certain case management systems. These tools are essential for improving efficiency and service delivery, especially as counties are increasingly tasked with doing more with fewer resources. The bill's broad application risks forcing counties to abandon effective systems or simply decide not to implement new tools, slowing innovation and impeding public service.

Significant Compliance Obligations Cost Time and Money
AB 1018 imposes significant and costly new compliance obligations on counties, without providing funding or implementation support, and requires these activities to be completed within a timeframe that is not feasible for implementation.

Given the broad scope of the bill, counties will need to devote considerable time and resources upfront to inventory all currently deployed systems and determine which, if any, fall under the scope of this bill. This would require significant work and collaboration across local agency departments, including IT professionals, county counsel, and respective department heads and subject matter experts. Counties will also need to work with developers to determine whether the relevant tools need to be modified or replaced, or if the county will need to assume the responsibilities of the developer or find new tools altogether. The time and cost involved with making changes or assuming responsibility for the systems could be substantial. In some cases, counties may be forced to temporarily rely on alternative—and potentially less efficient—methods to carry out routine tasks while working toward full compliance.

Furthermore, counties will need to develop and implement comprehensive procedures addressing pre- and post-use disclosures, performance evaluations, third-party audits and impact assessments, corrections to personal information, new appeals processes, and long-term data retention. These are not minor administrative tasks; they require significant time, expertise, and resources to develop and implement ongoing. For example, the requirement to send pre- and post-use notices to job applicants and offer options to correct information and appeal the decision could result in thousands of notices being distributed annually. This would place a significant administrative burden on counties, especially if many of the applicants choose to correct the information or appeal the decision. Moreover, the bill's enforcement provisions expose local governments to increased litigation risks and costs.

Appeals Process Could Be Duplicative
AB 1018's appeals provisions may duplicate existing appeal and redetermination processes, including in the criminal justice system, certain government benefits and services, and in public employment contexts where collective bargaining agreements already provide mechanisms for appealing personnel decisions. Overlaying the new appeal rights included in AB 1018 could create confusion, workload redundancy, and legal uncertainty. To address these concerns, appeal rights under AB 1018 should be limited to instances where no other appeal process is available or provided by existing law.

Concerns about the Impacts on Future Use of ADS and AI Technology
Local governments are on the forefront of developing and adopting policies that establish practices for the secure, ethical, effective, and responsible use of AI. To this end, a team of thoughtful county leaders met throughout the first half of 2024 to develop and adopt statewide best practices and guiding principles for local government use of AI. This includes policies surrounding the use of algorithmic tools that align with our commitment to equity

and reducing racial and socioeconomic disparities and ensuring human oversight in decision-making to prevent overreliance on automated systems and mitigate bias. Counties are committed to using this technology responsibly, transparently, and ethically to improve processes, enhance services to residents, and support employees to do their best work.

While we understand the concerns this bill intends to address, our concerns are that it could ultimately discourage counties to use tools that can improve access, service delivery, and government efficiency. The bill's broad scope, significant implementation requirements, and substantial cost will place a significant strain on limited county budgets, preventing them from being able to adopt these technologies.

In summary, this bill creates a significant financial burden for counties—one that is unfunded and adds pressure to already strained local budgets. The costs are difficult to estimate but are likely to be substantial depending on a variety of factors, including the number of systems that meet the definitions in the bill, whether those systems require updates or need to be replaced, and the workload needed to implement the bill. We are concerned that this financial burden on counties will discourage the use of tools that can improve government efficiency.

For these reasons, we respectfully oppose AB 1018. Should you have any questions regarding our position, please do not hesitate to contact us.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

CC: The Honorable Rebecca Bauer-Kahan
Members and Consultants, Senate Appropriations Committee
Liah Burnley, Consultant, Senate Appropriations Committee
Morgan Branch, Consultant, Republican Caucus
Jith Meganathan, Deputy Legislative Affairs Secretary, Governor's Office

ASSEMBLY FLOOR ALERT

SB 346 (Durazo): Local agencies: transient occupancy taxes: short-term rental facilitator
As amended 7/07/25 - SUPPORT
Assembly Third Reading File

On behalf of the Urban Counties of California (UCC), the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC), we write in support of Senate Bill 346, Senator Durazo's measure that will **strengthen local tools to ensure compliance with local ordinances regarding the collection and remittance of transient occupancy taxes (TOT) applicable to short-term rentals.**

Regrettably, the application of local TOT ordinances and collection and remittance of taxes is inconsistent and often simply avoided, even when voluntary collection agreements are entered into. Because local agencies do not have access to the address or any other personally identifiable information for listed properties, even under voluntary collection agreements, cities and counties are in the untenable position of choosing between collecting some taxes without this critical information and trusting that it is accurately collected, or trying to pursue collection directly from property owners, which is a time- and cost-intensive process that may or may not result in a fair application of local laws.

SB 346 promises to increase TOT compliance and ensure that local agencies are appropriately collecting tax revenue from those that are lawfully licensed short-term rental properties by authorizing a local agency to require the short-term rental facilitator to report the physical address of the short-term rental property and, if that information is insufficient for the local agency, additional identifying information. Further, such authority will assist local agencies in ensuring that TOT obligations are consistent among other short-term stay facilities, like hotels, motels, and bed and breakfasts, and that those that profit from short-term rental properties are no longer able to obfuscate their location and therefore their tax obligations.

SB 346 is a much-needed effort to modernize California statute and provide local agencies the tools needed to fairly and effectively apply existing laws to evolving technologies. We respectfully urge your aye vote on SB 346.

cc: The Honorable Maria Elena Durazo, California State Senate
Ben Triffo, League of California Cities
Karen Lange, California Association of County Treasurers and Tax Collectors

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

August 13, 2025

The Honorable Buffy Wicks
Chair, Assembly Committee on Appropriations
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 364 (Strickland) – Advertising displays: customary maintenance.
OPPOSE UNLESS AMENDED (*As amended July 15, 2025*)

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), we regrettably must oppose Senate Bill 364 (Strickland), which expands the definition of "customary maintenance" for outdoor advertising structures that would potentially compromise public safety and efforts to protect environmental resources, as well as undermining public oversight of commercial interests. We are seeking amendments to narrow and refine the bill's definition of what is considered "customary maintenance" on billboards covered by the Outdoor Advertising Act. However, we are concerned with the fiscal costs of the bill, which are associated with increased workloads for county building departments as well as litigation costs related to the ambiguity of the bill's current definition of "customary maintenance."

By expanding the definition of "customary maintenance" in Business and Professions Code Section 5208.3 to include, "*replacing structural members, such as posts and internal bracing, and using stronger materials, while keeping or reducing the number of posts,"* SB 364 would effectively grant billboard owners the exact exemption from basic building and safety standards that was successfully defended against in *Viacom v. City of Arcata*, 140 Cal.App.4th 230 (2006). The Court of Appeal's decision was predicated on the fundamental legal distinction between repair and reconstruction—that substantial structural work requires permits because it constitutes reconstruction, not repair or maintenance. The League of California Cities filed an amicus brief in support of the City of Arcata when the case was pending before the Court of Appeal in 2006. As noted by the appellate court:

> "Customary maintenance" is a term used in two provisions of the State Act (§ 5225, 5412), but most fully explained in Regulation 2270 as "any activity performed" on an advertising display "for the purpose of actively maintaining the Display **in its existing approved physical configuration and size dimensions at the specific location**" approved on the permit issued by Caltrans. "Customary maintenance includes the following activities: (1) Changing of the advertising message. (2) Adding an Extension to an outside dimension of a Display as incident

CSAC Officers | **President** Jeff Griffiths, Inyo County | **1st Vice President** Susan Ellenberg, Santa Clara County | **2nd Vice President** Luis Alejo, Monterey County | **Past President** Bruce Gibson, San Luis Obispo County | **CEO** Graham Knaus

> to the copy for a temporary period up to three years. (3) The sale, lease, or transfer of the Display or its Permit. (4) Adding a Light Box." (*Ibid.,* subd. (a).) (*Viacom Outdoor*, 140 Cal. App. 4th at 241 (emphasis added).)

Additionally, the court found that "customary maintenance" does not encompass:

> (1) Raising the height of the Display from ground level. (2) Relocating all or portion of a Display. (3) Adding a back-up Facing …. [which is defined in Cal. Code Regs., tit. 4, § 2242, subd. (l) as "the portion of the Display that contains advertising copy"]. (4) Increasing any dimension of a Facing except as permitted by Section 2270(a)(2). (5) Turning the direction of a Facing. (6) Adding illumination or a Changeable message … with the exception of a light box." (*Ibid.,* subd. (b).) The import of Regulation 2270 is routine upkeep or modest improvements, not an extraordinary event like **rebuilding a billboard** after it has been destroyed. (*Viacom Outdoor*, 140 Cal. App. 4th at 241-42 (emphasis added).)

This bill's attempt to bypass the ruling in *Viacom v. City of Arcata* by creating an ambiguous definition of 'customary maintenance' will conflict with county building ordinances designed to protect public health and safety. If this definition is not narrowed and clarified, county building department personnel will experience increased workloads in the hundreds of thousands of dollars annually related to citing and fining advertising owners that engage in the heavy construction associated with the replacement of billboard structure that this bill allows. These actions will trigger litigation brought by advertising companies who undoubtedly will claim the broad definition of customary maintenance in this bill should prevail against county efforts to protect public health and safety.

Additionally, SB 364 creates the potential for disturbances to cultural and archaeological resources, particularly those significant to local tribal nations. Business and Professions Code Sections 5208.3 and 5412 could sidestep the review and consultation processes mandated by CEQA and other protective frameworks. The ambiguous definition of customary maintenance in this bill will lead to environmental and tribal groups bringing litigation against billboard owners and counties, alleging a failure on the part of the county to protect tribal and environmental resources. This would be a challenging situation as the bill's provisions and existing law would prevent county efforts to safeguard these resources by requiring a billboard owner to conduct cultural resource surveys or consultation would be challenged by the billboard owner as an impermissible "limitation" on maintenance under Section 5412.

As a result, SB 364 creates the potential for unnecessary litigation for counties charged with protecting cultural resources. Counties will be forced to choose between enforcing their

legal obligations to protect sensitive archaeological sites and tribal resources or avoiding costly eminent domain claims.

SB 364 is in direct conflict with California case law and local government's authority and would expose local governments to unnecessary litigation. For these reasons, CSAC must regrettably oppose SB 364 unless it is amended to address our concerns with the definition of "customary maintenance." However, we understand our concerns are being shared later in this year's session and also respectfully request that you withdraw the measure to allow more time for us to work with your office and stakeholders on this issue and any other relocation agreements related to outdoor advertising structures.

Thank you for your time and consideration. If you have any questions, please feel free to contact me at mneuburger@counties.org.

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties

cc: The Honorable Senator Tony Strickland
Members and Consultants, Assembly Committee on Appropriations

July 30, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 5610
Sacramento, CA 95814

RE: SB 485 (Reyes) – Appointment of County Public Defender
As amended 4/7/2025 – Oppose Unless Amended
Awaiting hearing – Assembly Appropriations Committee

Dear Chair Wicks:

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we write to respectfully express our joint opposition to SB 485, unless the measure is amended to include provisions to establish essential checks and balances regarding the appointment and removal of board of supervisors-appointed county public defenders.

SB 485 proposes to change the public defender's employment status from at-will to one in which removal may only occur by a majority vote of the local board of supervisors and only for neglect of duty, malfeasance, misconduct in office, or other good cause. While we understand and respect the underlying objective to ensure independence in this important role, we believe the bill, as currently written, lacks key structural safeguards. Our request for amendments is rooted in principles of good governance, organizational consistency, and process clarity – standards we would be seeking to accompany statutory changes in the employment status for any appointed county department head.

As it relates to fiscal impacts, it is our assessment that SB 485 would impose local costs in two specific areas:

- Work associated with establishing procedures for managing the new employment status for public defenders and for implementing said procedures going forward; and
- Exposure to litigation for future terminations of public defenders under new for-cause terminations.

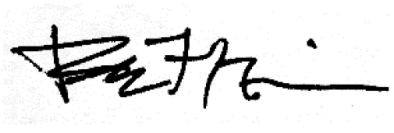
Although we understand that your committee primarily is focused on cost implications, we feel it is incumbent upon us to articulate the policy reasons behind our continued opposition to the bill, given that modest amendments that would align the changes to the appointed public defender's employment status to that of the county counsel have thus far been rejected. CSAC, UCC, and RCRC remain concerned about the long-term implications of a perpetual appointment if it is not paired with routine performance oversight or a structured review process. The county associations' proposed amendments – to establish a defined four-year term and to set forth a

clear process for judicial review should a public defender contest their removal from office -- are needed to ensure that all department heads are held to the same standards to meet their various responsibilities adequately. Public accountability is an essential element of county governance, and it is both reasonable and prudent to provide clear procedures in the event of a contested termination.

As organizations representing California's elected county supervisors, we urge the Legislature's consideration of these amendments, which seek to (1) ensure appropriate governance safeguards and (2) maintain comparability across appointed county leadership positions. ***If this measure were enacted without these amendments, the public defender's employment status would be an outlier in the broader county organizational framework for non-elected department heads.*** Our proposed changes are not intended to – and would not in practice – interfere with a public defender's constitutional obligation to provide clients with ethical and competent legal representation.

Please feel free to contact Ryan Morimune at CSAC (rmorimune@counties.org), Elizabeth Espinosa at UCC (ehe@hbeadvocacy.com), or Sarah Dukett at RCRC (sdukett@rcrcnet.org) for any questions on our associations' perspectives. Thank you.

Sincerely,



Ryan Morimune
Senior Legislative Representative
CSAC

Elizabeth Espinosa
Legislative Representative
UCC

Sarah Dukett
Policy Advocate
RCRC

Cc: The Honorable Eloise Gómez Reyes, Member of the Senate
Members and Consultants, Assembly Appropriations Committee

August 9, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 487 (Grayson) – Workers' Compensation Third Party Recovery
OPPOSED, AS AMENDED ON 7/8/25

Dear Chair Wicks,

The undersigned organizations are respectfully opposed to **SB 487**, which would limit the right of public agency employers, including the State of California, to recover the cost of providing workers' compensation benefits when a law enforcement officer or firefighter is injured at work and a third party is partially or entirely responsible. Public safety officers enjoy generous salary continuation benefits, presumptions for several types of injuries and illnesses, and Industrial Disability Retirement (IDR) benefits that aren't available to any other type of worker in the state. As a result, state and local governments have a higher cost of providing workers' compensation benefits to police officers and firefighters, and recovering costs from responsible third parties is vitally important to protect public resources and the taxpayers.

<u>No Data to Justify Proposed Policy</u>
The legislature has a strong history of closely examining proposed workers' compensation policy changes through the joint labor-management Commission on Health and Safety and Workers' Compensation (CHSWC). According to the CHSWC website, it was created in 1993 to examine health

and safety and workers' compensation systems and recommend administrative or legislative modifications to improve their operation. In recent years, the legislature has often turned to CHSWC for answers when, much like with SB 487, they are confronted with proposed workers' compensation legislation that is based largely on anecdote instead of data.

When an employee is injured by a third party during the course and scope of their employment, the employer, regardless of who is at fault, must provide full workers' compensation benefits. This includes all forms of disability, both temporary and permanent, any associated expenses and vocational rehabilitation if applicable. In addition, the employer is bound to provide medical treatment for the duration of that employee's life for the injured body parts or conditions. An example of an injury sustained at the fault of a third party is when a motor vehicle accident occurs outside of the employer's premises and outside of the employer's control. Regardless, the employer is still obligated to provide all statutory workers' compensation benefits to the employee. As such, the employer's only remedy for reimbursement of the costs incurred because of another party is via subrogation recovery.

The public sector entities affected by SB 487 have limited resources available to provide services to the public. If the legislature is going to upend well-established public policy related to third party subrogation, it should do so only after being fully informed. Proponents of SB 487 have not provided any objective evidence suggesting law enforcement and firefighters are frequently facing bad outcomes in third party litigation related to workplace injuries.

Special Benefits Mean Less Economic Harm for Workers and Higher Costs for Employers

The state and local government employers of police officers and firefighters have high workers' compensation costs precisely because their union representatives have lobbied endlessly for expensive special benefits designed to minimize the economic impact of workplace injuries.

Most employees who are unable to work because of their workplace injury are paid temporary disability benefits at a rate of 2/3 of their average weekly wage, with a maximum benefit amount of $1,680.29 per week in 2025. Instead of receiving normal temporary disability benefits, law enforcement and firefighters who are unable to work because of their workplace injury are paid their *full salaries tax free for an entire year* under Labor Code Section 4850. While it may be hard to believe, those who are receiving benefits under Labor Code Section 4850 take home more than when earning their normal salary. The special benefits both minimize the economic harm to the injured employee and cause the employer to have higher costs associated with the injury.

In addition, a law enforcement or firefighter who is hurt on the job and, as a result, is permanently unable to perform their current position is eligible for Industrial Disability Retirement. The base benefit for IDR is 50% of the final compensation amount, but it can get higher (3% for each year of service), *and the first 50% is non-taxable*. Depending on their tenure, law enforcement and firefighters with longer years of service can take home more pay under IDR than they did while working because of the tax treatment. This amount is paid to the injured employee, in addition to permanent disability benefits paid under the workers' compensation system that are designed to compensate for physical impairment from the injury. Law Enforcement personnel and firefighters receiving IDR benefits are not precluded from working outside of their classification in other occupations, and working does not reduce the IDR benefit. As a result, many police officers and firefighters receiving IDR benefits are also gainfully employed.

Law Enforcement and firefighters already received costly special benefits that protect them from economic harms associated with injuries. The legislature should more closely examine the need to also

allow these employees to recover from responsible third parties before their employer who has financed generous special benefits. Benefits paid to first responders come directly out of public agency budgets. State and local governments generally aren't covered by traditional insurance, rather are self-insured, so the costs associated with SB 487 will directly hit their budgets.

For these reasons, the undersigned organizations are respectfully **OPPOSED** to **SB 487** and urge your no vote when the bill is heard in the Assembly Appropriations Committee.

Sincerely,

California Association of Joint Powers Authorities
California Coalition on Workers' Compensation
California Joint Powers Insurance Authority
California Special Districts Association
California State Association of Counties
City of Bell
City of Chula Vista
City of Corona
City of Santa Barbara
County of Butte
County of Fresno
County of Humboldt
County of Kings
County of Placer
Golden State Risk Management Authority
League of California Cities
Local Agency Workers' Compensation Excess JPA
Northern California Special Districts Insurance Authority
Public Risk, Innovations, Solutions, and Management
Rural County Representatives of California
School's Insurance Authority
Urban Counties of California

CC: The Honorable Tim Grayson, California State Senate
Members and Consultants, Assembly Appropriations Committee
The Honorable Gavin Newsom, California State Governor
Department of Industrial Relations

July 9, 2025

The Honorable Lisa Calderon
Chair, Assembly Insurance Committee
1020 N Street, Room 369
Sacramento, CA 95814

RE: SB 487 (Grayson) – Workers' Compensation Third Party Recovery
OPPOSED, AS AMENDED ON 7/8/25

Dear Chair Calderon,

The undersigned organizations are respectfully opposed to **SB 487**, which would limit the right of public agency employers, including the State of California, to recover the cost of providing workers' compensation benefits when a law enforcement officer or firefighter is injured at work and a third party is partially or entirely responsible. Public safety officers enjoy generous salary continuation benefits, presumptions for several types of injuries and illnesses, and Industrial Disability Retirement (IDR) benefits that aren't available to any other type of worker in the state. As a result, state and local governments have a higher cost of providing workers' compensation benefits to police officers and firefighters, and recovering costs from responsible third parties is vitally important to protect public resources and the taxpayers.

<u>No Data to Justify Proposed Policy</u>
The legislature has a strong history of closely examining proposed workers' compensation policy changes through the joint labor-management Commission on Health and Safety and Workers' Compensation (CHSWC). According to the CHSWC website, it was created in 1993 to examine health

and safety and workers' compensation systems and recommend administrative or legislative modifications to improve their operation. In recent years, the legislature has often turned to CHSWC for answers when, much like with SB 487, they are confronted with proposed workers' compensation legislation that is based largely on anecdote instead of data.

When an employee is injured by a third party during the course and scope of their employment, the employer, regardless of who is at fault, must provide full workers' compensation benefits. This includes all forms of disability, both temporary and permanent, any associated expenses and vocational rehabilitation if applicable. In addition, the employer is bound to provide medical treatment for the duration of that employee's life for the injured body parts or conditions. An example of an injury sustained at the fault of a third party is when a motor vehicle accident occurs outside of the employer's premises and outside of the employer's control. Regardless, the employer is still obligated to provide all statutory workers' compensation benefits to the employee. As such, the employer's only remedy for reimbursement of the costs incurred because of another party is via subrogation recovery.

The public sector entities affected by SB 487 have limited resources available to provide services to the public. If the legislature is going to upend well-established public policy related to third party subrogation, it should do so only after being fully informed. Proponents of SB 487 have not provided any objective evidence suggesting law enforcement and firefighters are frequently facing bad outcomes in third party litigation related to workplace injuries.

Special Benefits Mean Less Economic Harm for Workers and Higher Costs for Employers

The state and local government employers of police officers and firefighters have high workers' compensation costs precisely because their union representatives have lobbied endlessly for expensive special benefits designed to minimize the economic impact of workplace injuries.

Most employees who are unable to work because of their workplace injury are paid temporary disability benefits at a rate of 2/3 of their average weekly wage, with a maximum benefit amount of $1,680.29 per week in 2025. Instead of receiving normal temporary disability benefits, law enforcement and firefighters who are unable to work because of their workplace injury are paid their *full salaries tax free for an entire year* under Labor Code Section 4850. While it may be hard to believe, those who are receiving benefits under Labor Code Section 4850 take home more than when earning their normal salary. The special benefits both minimize the economic harm to the injured employee and cause the employer to have higher costs associated with the injury.

In addition, a law enforcement or firefighter who is hurt on the job and, as a result, is permanently unable to perform their current position is eligible for Industrial Disability Retirement. The base benefit for IDR is 50% of the final compensation amount, but it can get higher (3% for each year of service), *and the first 50% is non-taxable*. Depending on their tenure, law enforcement and firefighters with longer years of service can take home more pay under IDR than they did while working because of the tax treatment. This amount is paid to the injured employee, in addition to permanent disability benefits paid under the workers' compensation system that are designed to compensate for physical impairment from the injury. Law Enforcement personnel and firefighters receiving IDR benefits are not precluded from working outside of their classification in other occupations, and working does not reduce the IDR benefit. As a result, many police officers and firefighters receiving IDR benefits are also gainfully employed.

Law Enforcement and firefighters already received costly special benefits that protect them from economic harms associated with injuries. The legislature should more closely examine the need to also

allow these employees to recover from responsible third parties before their employer who has financed generous special benefits. Benefits paid to first responders come directly out of public agency budgets. State and local governments generally aren't covered by traditional insurance, rather are self-insured, so the costs associated with SB 487 will directly hit their budgets.

For these reasons, the undersigned organizations are respectfully **OPPOSED** to **SB 487** and urge your no vote when the bill is heard in the Assembly Insurance Committee.

Sincerely,

California Association of Joint Powers Authorities
California Coalition on Workers' Compensation
California Joint Powers Insurance Authority
California Special Districts Association
California State Association of Counties
City of Bell
City of Chula Vista
City of Santa Barbara
County of Butte
County of Fresno
County of Humboldt
County of Kings
County of Placer
Golden State Risk Management Authority
League of California Cities
Local Agency Workers' Compensation Excess JPA
Northern California Special Districts Insurance Authority
Public Risk, Innovations, Solutions, and Management
Rural County Representatives of California
School's Insurance Authority
Urban Counties of California

CC: The Honorable Tim Grayson, California State Senate
Members and Consultants, Assembly Insurance Committee
The Honorable Gavin Newsom, California State Governor
Department of Industrial Relations

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

August 13, 2025

The Honorable Buffy Wicks, Chair
Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 577 (Laird) – State Government
As Amended July 9, 2025 – SUPPORT, IF AMENDED
Set to be heard in Assembly Appropriations Committee

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), we write in support of SB 577 (Laird). Currently, counties, schools, and other local agencies are facing budget crises due in part to recent laws that reopened statutes of limitations for cases of childhood sexual assault from decades in the past.

Those laws rightly sought justice for unspeakable acts that occurred in facilities meant to serve those most in need. Since their enactment, we have seen local agencies and schools face billions in liability costs and skyrocketing insurance premiums that have forced counties to limit public services for those who need them now. All of this is happening at a time when counties are facing unprecedented cuts to essential services funded by the federal government – for Medi-Cal, CalFresh, and many other programs that rely on federal support.

We appreciate the provisions in SB 577 that aim to address our concerns. These include codification of a recent court decision that public entities are not liable for treble damages; reduction of the look-back period for claims of delayed awareness beyond a claimant's 40th birthday to three years; a bar on refiling previously dismissed actions if five or more years from the original filing date have passed; the requirement that a filing cannot be accepted without the inclusion of the mandatory certificate of merit; retention of court discretion to fairly structure the payment period over which damages awarded against a public entity are paid; and, clean-up language related to judgment obligation bonds.

However, we caution that the true benefit of these changes may not be known for quite some time and could be offset by changes to behavior by plaintiff's attorneys, the courts, and other unknown factors. For example, while the changes to payment periods will provide agencies more flexibility, it will not change the underlying impacts to local agency budgets and could invite larger payments on the assumption that agencies will have more time and tools to pay off their liability.

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

We believe more must be done to ensure that justice can be delivered without sacrificing current services. We recognize that all of these provisions are complex and are unlikely to be accomplished before the end of this session. We offer these changes to underscore how much work is left to be done – and as a starting point for future legislation.

Prevention Efforts
More must be done to aid the prevention of future abuses. Counties and other local agencies can and will do more to improve prevention efforts, but there are opportunities to ensure these efforts through statutory changes. That includes:

- Requirements for local agency policies that define appropriate and inappropriate conduct;
- Required postings for staff and potential victims about how to identify risks and report them;
- Consideration of changes to local ombuds requirements to ensure that more local agencies have an independent intermediary; and
- Improvements to training – and consideration of who must undergo training – to identify and report grooming and other childhood sexual assault risks.

Any changes to mandated reporter training must supplement the recent discussions among local welfare directors, the state, and the administration regarding mandated reporter reform.

Appropriate Limits on Attorney Fees
Another important consideration that remains unaddressed is the need for limits on attorneys' fees. Public funds should primarily compensate the individuals who have been harmed, yet in many cases, a significant portion of awards is shared with attorneys. While it is reasonable to ensure fair compensation for attorneys who take on these cases without upfront payment from claimants, the expenditure of tens of millions of public dollars on fees alone is difficult to justify. Establishing a cap on attorneys' fees is a reasonable and necessary topic for discussion.

Reasonable Limits for Awards
Public agencies and schools have seen payouts in the tens of millions of dollars for a variety of liability cases that go beyond the topics covered in SB 577, including for traffic accidents, injuries on sidewalks, and countless other examples. These cases have seen wildly varying payouts despite common factors across cases, leaving agencies with vast budget uncertainty.

Several Liability
We believe reform is well overdue regarding when public agencies should be held liable. Too often, government agencies are seen as deep pockets and become liable for incidents in

which they had only a fraction of the fault. We are not seeking to absolve agencies of responsibility for cases where they are liable. That could include establishing rules for non-economic and economic damages that more closely align public agency liability with their responsibilities for being at fault.

Victim's Compensation Fund
We understand the difficulties in discussing a victim's compensation fund in this budget environment. However, the realities we are facing include severe budget uncertainty and, in some cases, liability and insurance costs that are directly impacting county budgets and the services we provide. This is happening now.

There are models for a victim's compensation fund that could be pursued, particularly for cases in which records may not exist or when agencies have demonstrated they did not know or could not have known about assault risks.

Additional Reform Consideration
We believe it is critical to continue discussions on other reform concepts that have been discussed regarding this and other legislation. That includes changes to evidence standards; clearly defining the standard of knowledge for a local agency or school; and establishment of a commission dedicated to care, counseling, and other services for victims.

Conclusion
We want to emphasize the vast complexity of this issue. We share these concepts for reform with a clear understanding about the difficulty of achieving a proper balance. Clearly, victims deserve justice. However, a system that endangers essential services for those who most desperately need them is not well balanced. We appreciate the efforts in this bill to achieve a better balance. While aspects of this bill are a helpful starting point, we believe more work must be done.

Sincerely,

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties
elawyer@counties.org

CSAC Officers

President Jeff Griffiths, Inyo County
1st Vice President Susan Ellenberg, Santa Clara County
2nd Vice President Luis Alejo, Monterey County
Past President Bruce Gibson, San Luis Obispo County
CEO Graham Knaus

CC: The Honorable John Laird, Member, California State Senate
Members and Staff, Assembly Committee on Appropriations
Annika Carlson, Principal Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director, Republican Caucus

California State Association of Counties®
1100 K Street, Suite 101 | Sacramento, CA 95814

July 16, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 615 (Allen) Vehicle traction batteries.
As amended on July 7, 2025 – Notice of SUPPORT
To be heard in the Assembly Appropriations Committee

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in **support** of SB 615 (Allen), which would make manufacturers responsible for the end-of-life (EOL) management of vehicle traction batteries.

As an early driver and adopter of zero emission vehicle (ZEV) technology, California is also at the forefront of dealing with the EOL management of electric vehicle (EV) batteries. In California, all batteries are considered hazardous waste at EOL. However, batteries are inherently valuable as they contain critical earth minerals that can be recycled and reused. If batteries are not handled properly at EOL, they also pose a potential environmental health and public safety hazard.

Batteries that are still under warranty are typically returned to the original equipment manufacturer (OEM) for repair or replacement, but if EV batteries are outside of their warranty, OEMS are not required to take them back. Therefore, a coherent state policy must be designed to ensure all vehicle traction batteries are reused, repaired, repurposed, remanufactured, and recycled.

SB 615 would require a battery supplier to be responsible for ensuring the proper EOL management of a vehicle traction battery if it is removed from a vehicle that is still in service, or if the vehicle traction battery is offered or returned to its battery supplier. SB 615 would also require reporting to the Department of Toxic Substances Control regarding the sale, transfer, or receipt of a vehicle traction battery or battery module.

CSAC Officers

President	1st Vice President	2nd Vice President	Past President	CEO
Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

For these reasons, CSAC **supports** SB 615. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

Sincerely,

Jordan Wells
Legislative Advocate
California State Association of Counties

CC : The Honorable Ben Allen, Member of the California State Senate

August 12, 2025

The Honorable Buffy Wicks
Chair, Assembly Committee on Appropriations
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 707 (Durazo): Open meetings: meeting and teleconference requirements
As Amended July 17, 2025 – SUPPORT
Set to be heard in the Assembly Committee on Appropriations

Dear Chair Wicks,

The California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and Urban Counties of California (UCC) write in proud support of SB 707 (Durazo). SB 707 would represent the most extensive changes to the Brown Act in several years, with a variety of changes designed to improve public participation in local government meetings, expand accessibility for members and the public, and includes several provisions that address the needs of local governments. In total, SB 707 represents a balanced approach in the modernization of the Brown Act.

Since late-2024, we have enjoyed a strong working relationship with the Senator, committee staff, and the variety of stakeholders representing local government organizations, civil liberties, the press, and open government advocates. It's often said that the definition of compromise is when no party is satisfied. However, there's reasons for everyone to be satisfied with this law, including:

- Improved accessibility for the public through remote participation provisions, agenda translation, accommodation of interpretation services, outreach provisions, and increased requirements for how agendas and meeting materials are displayed for the public;
- Improved accessibility for members of Brown Act bodies, including extension of the sunset date for existing remote meeting options, new flexibility for advisory body members, new flexibility for multi-jurisdictional body members, clarification that remote disruption of meetings (e.g. "Zoombombing,") can be addressed, and expansion of emergency meeting provisions; and
- Accountability measures, including expanded requirements regarding reporting of closed session decisions for the compensation of department heads and

administrative officers, allowing District Attorneys additional time to submit a cease and desist letter for meeting violations, and additional restrictions on the use of special meetings for decisions on compensation for a legislative body.

To be clear, there are remaining issues we would like to address in this bill, and we look forward to continuing our efforts with the Senator to address them. To that end, we share the following concerns and suggestions on how to address them.

Fiscal impacts for local agencies

While changes to the Brown Act are not reimbursable state-mandated costs, SB 707 will impose costs on local agencies for required translation, remote participation options, website changes, changes to procedures, training, and other requirements. We caution that the committee consider these impacts, particularly given the interest among some stakeholders to increase the costs of this bill for local agencies by adding to the bill's requirements.

Implementation timelines for some provisions

Some of the new requirements in SB 707 could necessitate new procurement efforts, staff training, and website development. To ensure that local agencies can meet the requirements of SB 707, and to provide additional time for the testing of the bill's new requirements, we request a six month delayed implementation deadline for the following provisions:

- § 54953.4(a)(1)(A)(i)(l) – Requirement that all open and public meetings shall include an opportunity for members of the public to attend via a two-way telephonic or audiovisual platform. While many counties already use either system, a delayed implementation deadline will ensure that any training, testing, or procurement can be completed before compliance is required.
- § 54953.4(a)(3)(b) – Requirement to establish an accessible webpage dedicated to public meetings that includes a meeting calendar, explanation of the meeting process, and other information. For some counties, this change could require additional work by their website vendor that may not be able to be completed before the implementation date.
- § 54953.4(b)(1)(a) – Requirement for eligible legislative bodies to translate meeting agendas and instructions on how to join the meeting by telephonic or internet-based service options. While some counties may already have contracts in place for translation services, some counties may need to conduct a procurement effort or amend existing contracts with service providers. This may not be possible before January 1, 2026.

To balance these delayed implementation dates, we would be comfortable with also extending the implementation dates for some of the new flexibilities for remote meeting participation, including the remote meeting options for non-decision-making advisory bodies established in § 54953.8.6 and the remote meeting participation options for multi-jurisdictional bodies established in § 54953.8.7.

Remote public comment

Many of our members have concerns about the requirements for providing remote public comment at meetings. These include concerns about cost, as well as concerns regarding impacts to the duration of meetings. We understand the need to balance the provisions of this bill that provide additional public accessibility. While we hope these concerns do not come to fruition, and are comfortable with the requirements in the bill today, we would like to revisit this issue in future years if these concerns are realized.

In conclusion, we believe these remaining challenges can be addressed. Once again, we appreciate the willingness of Senator Durazo and committee staff to work with local government associations on this critical legislation and look forward to our continued efforts on SB 707.

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we are proud to support SB 707.

Sincerely,

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties
elawyer@counties.org

Sarah Dukett
Senior Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

Jean Hurst
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

cc: The Honorable Senator María Elena Durazo
Members and Consultants, Assembly Appropriations Committee
Jay Dickenson, Chief Consultant, Assembly Appropriations Committee
Joe Shinstock, Consultant, Assembly Republican Caucus

July 14, 2025

Eric Berg
Deputy Chief, Health and Research and Standards
Cal/OSHA / Division of Occupational Safety and Health
1515 Clay Street
Suite 1901
Oakland, CA 94612

RE: Proposed Regulations for Implementation of Workplace Violence Prevention Under Senate Bill 553 (Cortese, 2023) – May 13, 2025, Working Draft

Dear Deputy Chief Berg,

The California State Association of Counties (CSAC), Association of California School Administrators (ACSA), and California Special Districts Association (CSDA) appreciate the opportunity to provide input on the draft proposed regulations well before they are considered by the Occupational Safety and Health Standards Board (OSHSB). We extend our thanks to the staff and leadership for your efforts to make the process inclusive and transparent.

Local government agencies and local educational agencies value our workforce and take our responsibilities to protect their health and safety as an imperative duty. Due to several concerns, including the expansion of temporary restraining order (TRO) filing authority and administrative burdens that cannot be recouped through cost recovery, local governments opposed Senate Bill 553 (Cortese, 2023). Our deliberation of SB 553 yielded some changes from the original version, some of which were absolutely critical. Regrettably, some of these provisions have returned in the proposed regulations.

Local governments and schools have a duty to provide essential public services, and our workforce must conduct their work in a variety of environments, some of which have increased risk than others due to the nature of our work. Local governments and schools already work constantly to mitigate those hazards and take actions necessary to keep our workforce safe. We have general concerns about policies that raise legal risks for local governments that are simply trying to provide essential public services. These concerns are heightened by an environment in which we face budget crises at the state and local level, limitations in our ability to raise revenue needed to meet heightened service delivery expectations, and crushing legal liabilities brought by recently enacted legislation, leading to fiscal pressures of both legal expenses and insurance costs.

With those thoughts in mind, we share the following comments on the version of the proposed regulations posted on May 13, 2025. We look forward to future opportunities to share our perspective on these regulations throughout this year and during formal rulemaking.

§3343(a)(1)
Exception 6 would apply to employers with fewer than 10 employes and are in compliance with section 3203 whose places of employment are not accessible to the public. Additional language notes that the exception does not apply to "security services," among others. We request additional clarity to define the meaning of security services for this purpose, as some local agencies and local educational agencies have in-house security.

§3343(b)(3)(J)
This draft of the proposed regulations would add "visibility improvements," to the list of engineering controls. We would like to note that the legislature is presently considering legislation to push back on the use of cameras in certain highly-populated parts of workplaces, including break rooms and cafeterias.[1] We are greatly concerned that, if enacted, this legislation would slow response times for all types of violence under the Standard, but particularly Type 3 violence–and contradict the requirements of this definition.

To the extent that such legislation contradicts the Division's policy goals of improving visibility and removing blind spots in workplaces, employers will be stuck in the middle of conflicting goals in statute and regulation. We would urge the Division to take note of, and consider engagement in, that legislative conversation. If the bill passes as written, the Division would need to consider how the regulations could accommodate legislation that restricts our ability to address visibility issues in preventing workplace violence.

§3343(b)(6)(C) & §3343(d) – Violence Incident Log
We appreciate the addition of a clarifying note in response to the concerns we shared previously that this section could require local agencies and schools to log any threat made online for local officials. While we take any threat of violence against public officials seriously, we were concerned that the regulations could set up local agencies to fail by requiring them to find *all* public threats made and log them accordingly. We would, however, like to see an adjustment to the language to account for threats made by the public at large, as the note speaks only to threats made by employees.

[1] AB 1331 (Elhawary) effectively prohibits the use of cameras in break rooms or cafeterias as of the date of this letter by requiring that such cameras cannot be monitored by the employer, and the footage cannot be recalled *unless* an employee in the footage requests the footage, or law enforcement requests it. This effectively prohibits live monitoring of potential workplace violence scenarios in such areas.

To that end, the note should read as follows:

> **NOTE: The employer is not responsible for ~~employee's~~ texts, electronic messages, or ~~personal~~ social media that are not brought to the attention of the employer or that the employer could not otherwise be reasonably aware of.**

§3343(c)(6) – Concerns with addition of authorized employee representatives to those who are informed about investigations

We continue to have concerns with the addition of "authorized employee representative," to this section. Unlike statute, the proposed regulations would require employers to inform employee representatives, in addition to employees, about the results of workplace violence investigations. We believe this addition goes outside of the scope of the law and have concerns that it could challenge the ability for employers to maintain confidentiality in reporting on workplace violence investigations.

We believe this concern is best addressed by simply striking the addition of "authorized employee representatives," from the section. Employee representatives are already well engaged in the process to update the plans to reflect new or growing threats to workplace safety and incident logs are available for review to meet this purpose.

§3343(c)(9) – Changes needed to limit liability to public employers who are not aware of a hazard

Section 6401.9(c)(2)(I) requires employers to include in their workplace violence prevention plan procedures to, among other things, inspect workplace violence hazards whenever the employer is "made aware," of a new or previously unrecognized hazard. The proposed regulations in §3343(c)(9) lack any similar language that would require an employer to have been aware of a new hazard, and, instead, requires inspections when there are simply changes in the workplace that "represent a new hazard."

Without the critical language that employers must be "made aware," of a new hazard, we worry that this section sets public employers up for failure to be aware of unknown hazards.

Definitions of Workplace Violence Hazards – §3343(b)(3), (8), and (9)

Serving the public and delivering essential services inherently requires public employees to conduct their work in the presence of many of the factors included in this section. The nature of their work may require employees to conduct their work alone, in the presence of the public, and late at night or early in the morning. Further, many public employers are required by law to have their worksites provide open access to the public and many public employers go above and beyond those requirements out of a duty to ensure their work is open to public scrutiny.

Without the recent amendments, this section would have effectively categorized the work of librarians, waste collection, search and rescue services, child and adult protective services, teachers, benefit administration, elections officials and volunteers, and so many other forms of essential public services to be a workplace hazard that requires correction.

We appreciate the additions made that clarify that not all workplace violence controls are applicable to all workplaces or hazards. We do, however, believe that this language could be improved by including language noting that these are "factors to consider when identifying" workplace violence hazards. Our concern is that listing items implies that their presence compels public agencies to correct those hazards – which, for the reasons we explained earlier, naturally arise in the work of public agencies.

Additionally, we continue to have concerns regarding the inclusion of staffing as a "work practice control." We believe this addition goes well beyond the categories of work practice controls established in statute and creates an unworkable obligation for public agencies. Public agencies are required to provide essential public services and deliver state mandated programs with minimal resources and cannot easily reassign employees due to memorandums of understanding with employees.

Furthermore, there is no definition in the regulations about what may be appropriate staffing, leading public employers to navigate an undefined, unclear, and expensive mandate that would add to the workforce recruitment and retention challenges faced by all levels of government in California.

We believe these concerns are best addressed by removing "and staffing," from the first sentence in the paragraph and "appropriate staffing levels," from the following sentence.

§3343(c)(11)(C)
We appreciate the clarification that trauma counseling offered to an employee through worker's compensation, as well as employee assistance programs, satisfy the requirement for individual trauma counseling.

§3343(c)(11)(G)
We believe this language is appropriate. Any post-incident response should naturally rely on discussing the incident with employees involved and using their observations to evaluate workplace controls and opportunities to improve workplace violence mitigation. We note that there are two bills currently moving that could severely restrict the ability of employers to conduct this post-incident investigation: AB 340 (Ahrens) and AB 1109 (Kalra). AB 340 would prohibit employers from questioning employees or employee representatives about certain communications made in confidence between the employee

and their representative, while AB 1109 would create an evidentiary privilege for similar communications.

Should either bill be signed into law, this section would need to be reconsidered in order to avoid compelling employers from violating those laws in response to requirements established in these regulations.

§3343(f)(6)
This section would require agencies to provide personal identifying information to the division upon request. We note that pending legislation, AB 1337 (Ward), would make this action illegal, as the sharing of data would not "further the purpose," for which the data were collected. Should that law take effect, this section would need to be reconsidered and amended to avoid compelling agencies to violate the law.

Thank you again for the opportunity to provide comments on the draft proposed regulations. We appreciate the efforts of Cal/OSHA and its staff to solicit the input of impacted employers and hope that our comments help shape regulations that ensure our workers are safe without exposing public agencies to unnecessary administrative burdens or legal risk.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Dorothy Johnson
Legislative Advocate
Association of California School Administrators
djohnson@acsa.org

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
aarona@csda.net

August 14, 2025

The Honorable Gavin Newsom
Governor, State of California

The Honorable Mike McGuire
Senate President pro Tempore

The Honorable Robert Rivas
Speaker, California State Assembly

The Honorable Monique Limón
Senate President pro Tempore - Elect

The Honorable Jesse Gabriel
Chair, Assembly Budget Committee

The Honorable Scott Wiener
Chair, Senate Budget and Fiscal Review Committee

The Honorable Sharon Quirk-Silva
Chair, Assembly Budget Subcommittee No. 5 on State Administration

The Honorable Christopher Cabaldon
Chair, Senate Budget and Fiscal Review Subcommittee No.4 on State Administration and General Government

Dear Governor Newsom and Honorable Leaders of the California Legislature:

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California Association of Clerks and Election Officials (CACEO), we write to request that, **if a statewide special election is called this fall, counties receive funding in advance for the costs associated with administering the election.**

While cities, special districts, and schools cover their share of costs for regularly scheduled elections, the additional expenses tied to a statewide special election would fall almost entirely on counties — imposing a significant and unfunded financial burden on already strained local budgets.

The 2021 statewide special election cost a total of $200 million, of which $174 million supported county costs for administration[1]. We anticipate costs could be even higher for this special election. Only a minimal amount of the anticipated costs may be offset in the 19 counties that already have elections scheduled, since those elections are limited in scope and not held countywide. For the remaining 39 counties across California that currently do not have an election scheduled for November 2025, this is an unexpected, unbudgeted, major event that is rapidly approaching. **Ensuring that all counties have the funds necessary to administer a statewide special election is critical and necessary.**

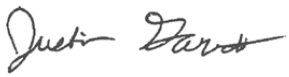
[1] https://elections.cdn.sos.ca.gov/statewide-elections/2021-recall/report-to-legislature.pdf

County election officials and county election staff statewide are unwavering in their efforts to ensure that elections are conducted with the highest standards of fairness, safety, and accessibility. Now, more than ever, it is imperative to empower county election officials as they administer elections that are secure, accessible, and that every voter can trust. California must ensure all counties are sufficiently funded to carry out their responsibilities.

Our organizations have collectively supported additional investments in elections administration for many years, given the importance of ensuring fair and free elections and maintaining the public's confidence in election results. To that end, we respectfully **urge your inclusion of state funding** for county administration of any potential special election to avoid unfairly burdening counties with such a significant cost.

Please feel free to contact us at any time with questions or to further discuss our request.

Sincerely,



Justin Garrett
Interim Chief Policy Officer, CSAC
jgarrett@counties.org

Jean Kinney Hurst
Legislative Advocate, UCC
jkh@hbeadvocacy.com

Sarah Dukett
Senior Policy Advocate, RCRC
sdukett@rcrcnet.org

Jesse Salinas
Yolo County Registrar of Voters and
President, CACEO

CC : Honorable Members and Consultants, Senate Budget and Fiscal Review Committee
Honorable Members and Consultants, Assembly Budget Committee
Christopher Woods, Chief Fiscal Adviser, Budget Director, Office of Senate President pro Tempore Mike McGuire
Jason Sisney, Budget Director, Office of Assembly Speaker Robert Rivas
Elisa Wynne, Staff Director, Senate Budget and Fiscal Review Committee
Christian Griffith, Chief Consultant, Assembly Budget Committee
Kirk Feely, Fiscal Director, Senate Republican Caucus
Joe Shinstock, Fiscal Director, Assembly Republican Caucus
Nathan Barankin, Chief of Staff, Office of the Governor
Nani Coloretti, Cabinet Secretary, Office of the Governor
Joe Stephenshaw, Director, Department of Finance
Erika Li, Chief Deputy Director, Budgets, Department of Finance
Amy Jarvis, Program Budget Manager, Department of Finance

CSDA

3V
THREE VALLEYS
MUNICIPAL WATER DISTRICT

ACHD
ASSOCIATION OF CALIFORNIA
HEALTHCARE DISTRICTS

ACWA

CAPA

CARPD
California
Association
of Recreation
and Park
Districts

CMUA
CALIFORNIA MUNICIPAL UTILITIES
ASSOCIATION

CSAC

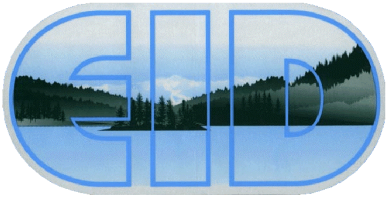
CALLEGUAS
MUNICIPAL WATER
DISTRICT

CMCA
CALIFORNIA MUNICIPAL
CLERKS ASSOCIATION

DESERT WATER

LEADERSHIP • PARTNERSHIP • STEWARDSHIP
EAST VALLEY
WATER DISTRICT

emwd


EID

75TH ANNIVERSARY
Inland Empire Utilities Agency
A MUNICIPAL WATER DISTRICT

Irvine Ranch
Water District

LAS VIRGENES
MUNICIPAL
EST. 1958
WATER DISTRICT

LEAGUE OF
CALIFORNIA
CITIES

MesaWater
DISTRICT©

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

PUENTE
BASIN
WATER
AGENCY

ROWLAND WATER
DISTRICT

RCRC

CITY OF SAN BERNARDINO
WATER DEPT.

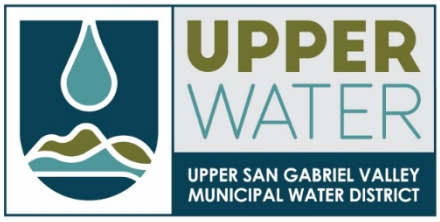
WQA
SAN GABRIEL BASIN
WATER QUALITY AUTHORITY

SAN GABRIEL VALLEY
The Voice of Business
Est. 1991
ECONOMIC PARTNERSHIP

SAN GABRIEL VALLEY
MUNICIPAL
WATER DISTRICT
AZUSA | SIERRA MADRE | MONTEREY PARK | ALHAMBRA

Solano County
Water Agency

SCWC


UPPER
WATER
UPPER SAN GABRIEL VALLEY
MUNICIPAL WATER DISTRICT

URBAN COUNTIES
OF CALIFORNIA

Walnut Valley
Water District

WRD
WATER REPLENISHMENT DISTRICT

WESTERN
MUNICIPAL WATER DISTRICT

PVID
EST. 1918

June 26, 2025

The Honorable María Elena Durazo
Chair, Senate Local Government Committee
State Capitol, Room 407
Sacramento, California 95814

RE: Assembly Bill 259 (Rubio) – Support [As Amended April 21, 2025]
Hearing Date: July 2, 2025 – *Senate Local Government Committee*

Dear Senator Durazo:

The undersigned organizations write to express our support for Assembly Bill 259 (Rubio), which will preserve important teleconferencing procedures that have afforded public agency board members the flexibility to attend meetings they might have otherwise not been able to attend.

Recognizing the evolving landscape of public meetings and the demonstrated value of remote participation options when members of governing bodies are unable to attend a physical gathering, the Legislature passed Assembly Bill 2449 in 2022, which amended the Ralph M. Brown Act. Beginning in 2023, special districts and other local agencies began using the procedures established by AB 2449, successfully facilitating remote participation for officials that would otherwise been encumbered by illness, official travel, or medical emergency. The provisions of that bill, having been negotiated by civil society groups and local government stakeholders, contained numerous requirements, including the presence of an in-person quorum at the official meeting location.

While the provisions added by AB 2449 were modified slightly by technical amendments made by subsequent legislation, the January 1, 2026 sunset included in the original bill remains. To preserve the flexibility provided by AB 2449, Assembly Bill 259 would extend the sunset date on those provisions to January 1, 2030, thereby preserving the remote meeting procedures added by the earlier legislation. AB 259 would not otherwise change any other elements of the remote meeting provisions.

For these reasons, we the undersigned are proud to support Assembly Bill 259 (Rubio). Please feel free to contact us if you have any questions.

Sincerely,

Marcus Detwiler
Legislative Representative
California Special Districts Association

Matthew Litchfield
General Manager
Three Valleys Municipal Water District

Sarah Bridge
VP, Advocacy & Strategy
Association of California Healthcare Districts

Julia Hall
State Legislative Director
Association of California Water Agencies

Kim Rothschild
Executive Director
California Association of Public Authorities for IHSS

Ethan Nagler
Legislative Representative
California Association of Recreation & Park Districts

Andrea Abergel
Director of Water
California Municipal Utilities Association

Eric Lawyer
Legislative Advocate
California State Association of Counties

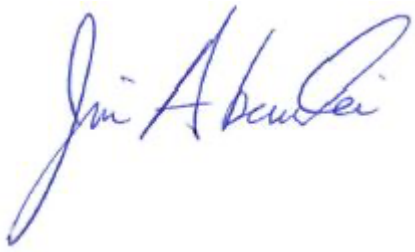
Kristine McCaffrey, P.E.
General Manager
Calleguas Municipal Water District

Dane Hutchings
Legislative Representative
California Municipal Clerks Association

Steve Johnson
General Manager
Desert Water Agency

Michael Moore
General Manager/CEO
East Valley Water District

Joe Mouawad, P.E.
General Manager
Eastern Municipal Water District



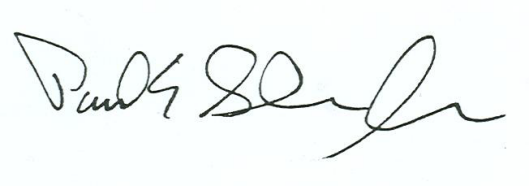
Jim Abercrombie
General Manager
El Dorado Irrigation District

Shivaji Deshmukh, P.E.
General Manager
Inland Empire Utilities Agency

Paul Cook
General Manager
Irvine Ranch Water District

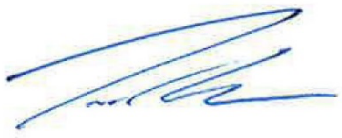
David Pedersen
General Manager
Las Virgenes Municipal Water District

Johnnie Piña
Legislative Affairs, Lobbyist
League of California Cities



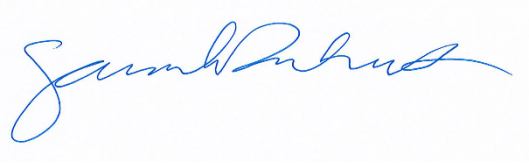
Paul E. Shoenberger, P.E.
General Manager
Mesa Water District

Deven Upadhyay
General Manager
Metropolitan Water District of Southern California



Jared Macias
Administrative Officer
Puente Basin Water Agency

Tom Coleman
General Manager
Rowland Water District



Sarah Dukett
Policy Advocate
Rural County Representatives of California

Miguel J. Guerrero, P.E.
General Manager
San Bernardino Municipal Water Department

Randy Schoellerman
Executive Director
San Gabriel Basin Water Quality Authority

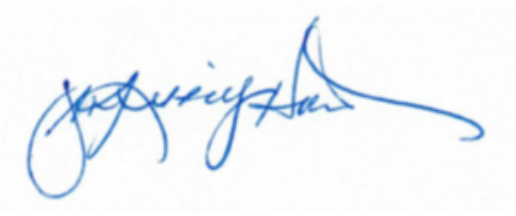
Luis Portillo
President & CEO
San Gabriel Valley Economic Partnership

Darin Kasamoto
General Manager
San Gabriel Valley Municipal Water District

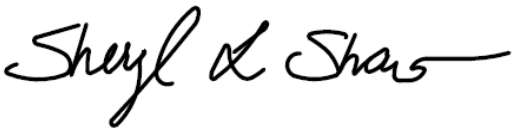
Chris Lee
General Manager
Solano County Water Agency

Charles Wilson
Executive Director
Southern California Water Coalition

Thomas Love
General Manager
Upper San Gabriel Valley Municipal Water District



Jean Hurst
Legislative Advocate
Urban Counties of California



Sheryl L. Shaw, P.E.
General Manager
Walnut Valley Water District

Stephan Tucker
General Manager
Water Replenishment District

Craig D. Miller, P.E.
General Manager
Western Municipal Water District

Dennis LaMoreaux
General Manager
Palmdale Water District

James Lee
General Manager
Crescenta Valley Water District

Fred Jung
Mayor
City of Fullerton

CC: The Honorable Blanca Rubio
Members, Senate Local Government Committee
Jonathan Peterson, Principal Consultant, Senate Local Government Committee
Ryan Eisberg, Consultant, Senate Republican Caucus
Brady Borcherding, Deputy Legislative Secretary, Office of Governor Newsom

URBAN COUNTIES OF CALIFORNIA
CSAC
RCRC
LEAGUE OF CALIFORNIA CITIES
CSDA
ACHD
ASSOCIATION OF CALIFORNIA HEALTHCARE DISTRICTS
CHEAC
Improving the Health of all Californians
ACEC
American Council of Engineering Companies
California
PRISM
Public Risk Innovation, Solutions, and Management
ACWA
Association of California Water Agencies
COUNTY OF SAN MATEO CALIFORNIA
THE SEAL OF CONTRA COSTA COUNTY CALIFORNIA
THE COUNTY OF SANTA CLARA 1850
MERCED COUNTY 18 55
COUNTY OF Placer
AIA California
COUNTY OF SACRAMENTO CALIFORNIA
SAN JOAQUIN COUNTY
CALIFORNIA BUILDING OFFICIALS
SSJID 115
SOUTH SAN JOAQUIN IRRIGATION DISTRICT
115 YEARS OF SERVICE
COUNTY OF LAKE STATE OF CALIFORNIA
THE COUNTY OF FRESNO 1856
COUNTY OF RIVERSIDE MAY 9, 1893
Transportation CALIFORNIA
CalGeo
The California Geotechnical Engineering Association
CARPD
California Association of Recreation and Park Districts
CELSA
CaliforniaTransit Association
CASA
Helix
WATER DISTRICT
CAPH
CALIFORNIA ASSOCIATION OF PUBLIC HOSPITALS & HEALTH SYSTEMS
Bay Area Air District
CalAnimals
Since 1909
American Water Works Association
California-NevadaSection
jurupa
COMMUNITY SERVICES DISTRICT
Proudly serving Jurupa Valley and Eastvale
APWA
CALIFORNIA CHAPTERS
COUNTY of VENTURA
HAYWARD AREA RECREATION AND PARK DISTRICT
HARD
SAN BERNARDINO COUNTY
CONTRA COSTA WATER DISTRICT
ASCE
AMERICAN SOCIETY OF CIVIL ENGINEERS
REGION 9
cprs
advancing california's park & recreation profession
VALLEY CENTER MUNICIPAL WATER DISTRICT
Water Conservation / A Way of Life
COUNTY OF LOS ANGELES CALIFORNIA
WATER DISTRICT
COACHELLA VALLEY WATER DISTRICT
ELSINORE VALLEY
MUNICIPAL WATER DISTRICT
ESTABLISHED 1956
OTAY
WATER DISTRICT
OLIVENHAIN
Municipal Water District
VID
VISTA IRRIGATION DISTRICT
Conejo
Recreation & Park District
West Valley Water District
SACRAMENTO AREA SEWER DISTRICT
CAJPA
California Association of Joint Powers Authorities
AGC CALIFORNIA
THE ASSOCIATED GENERAL CONTRACTORS OF AMERICA
Tahoe City Public Utility District

July 30, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
1021 O Street, Suite 7620
Sacramento, CA 95814

Re: **AB 339 (Ortega): Local public employee organizations: notice requirements**
As amended 7/15/25 – OPPOSE
Set for hearing 8/18/25 – Senate Appropriations Committee

Dear Senator Caballero:

On behalf of the Urban Counties of California (UCC), California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Association of California Healthcare Districts (ACHD), California Special Districts Association (CSDA), League of California Cities (CalCities), Public Risk Innovation, Solutions, and Management (PRISM), Association of California Water Agencies (ACWA), County Health Executives Association of California (CHEAC), California State Sheriffs' Association (CSSA), Contra Costa County, Fresno County, Lake County, Los Angeles County, Merced County, Placer County, Riverside County, Sacramento County, San Joaquin County, San Mateo County, Santa Clara County, San Bernardino County, Ventura County, South San Joaquin Irrigation District, American Council of Engineering Companies of California, California Geotechnical Engineering Association (CalGeo), the American Institute of Architects California, Transportation California, California Building Officials (CALBO), California Association of Recreation and Park Districts (CARPD), California Transit Association, California Association of Sanitation Agencies (CASA), the California and Nevada Civil Engineers and Land Surveyors Association (CELSA), Helix Water District, the California Association of Public Hospitals and Health Systems (CAPH), California Animal Welfare Association (CalAnimals), Bay Area Air District, California-Nevada Section, American Water Works Association (CA-NV AWWA), the Jurupa Community Services District, the American Public Works Association – California Chapters, the California Park and Recreation Society (CPRS), Contra Costa Water District, and the American Society of Civil Engineers (ASCE)-Region 9, Coachella Valley Water District, the California Association of Joint Powers Authorities (CAJPA), West Valley Water District, Olivenhain Municipal Water District, Valley Center Municipal Water District, Otay Water District, Vista Irrigation District, Tahoe City Public Utility District, Hayward Area Recreation and Park District, Conejo Recreation and Park District, Sacramento Area Sewer District, Elsinore Valley Municipal Water District, and the Association of General Contractors, we write in respectful opposition to Assembly Bill 339, as recently amended. This measure would require the governing body of a local public agency (non-school) to provide written notice to the employee organization no less than 60 days prior to issuing any request for proposals, request for quotes, or renewing or extending an existing contract to perform services that are within the scope of work of the job classifications represented by the recognized employee organization, and to engage in potentially extensive and lengthy negotiations regarding each of those actions upon request. AB 339 would be impractical in its execution, is unworkable for ensuring provision of public services, and undermines local labor negotiations. In addition, and importantly for your committee, AB 339 imposes significant costs to local agencies, including new noticing requirements, extended labor negotiations, and likely delays in services and projects.

AB 339 applies to ***any*** contract that is within the scope of work of any job classification represented by a recognized employee organization; for local agencies with represented workforces, this essentially means nearly every contract would be subject to notice and possible meet and confer. This provision is considerably broader than the existing requirement for bargaining under the Meyers-Milias Brown Act (MMBA); under existing law, where contracting out is legally permissible, local agencies are still required to "meet and confer in good faith" with any affected bargaining unit prior to making any decision ***that is within the scope of representation***. (Gov. Code, §§ 3505.) However, existing law incorporates several common-sense limitations upon the requirement to meet and confer – including where there is a longstanding past practice of contracting for particular services, or where contracting out is contemplated in the applicable MOU. AB 339 subverts these well-settled principles to the detriment of local public services by expanding opportunities for meet and confer negotiations, which – in addition to the bill's notification requirements – will expose local agencies to additional costs that result from a new and potentially significant workload increase. AB 339 may even impact the ability of local agencies to contract with the state for cooperative service provision.

It is important to note that an administrative remedy is already available to recognized employee organizations when they believe that a local agency has neglected to meet existing notification and meet and confer requirements regarding contracting. Failure to adhere to existing requirements under the MMBA and related case law subjects a local agency to a potential unfair labor practice charge at the Public Employment Relations Board (PERB).

The lack of definition of emergency or exigent circumstances in AB 339 undermines existing emergency contracting authority; further, this provision only applies to the initial notice requirement – not the meet and confer provisions – making the provision nearly meaningless in an emergency circumstance. You are undoubtedly aware of the considerable responsibility assumed by local agencies in a natural disaster, public health emergency, or other local crisis. As first responders, local agencies rely on existing statutes that allow for considerable flexibility to ensure the safety and well-being of our communities. Again, AB 339 would prove costly for local agencies attempting to focus available resources on response and recovery during an emergency.

In addition, AB 339 will significantly delay public works projects and could grind building permit processing, design, and construction of needed housing or infrastructure projects to a halt. Public works projects involve multiple phases of design, which require a diverse array of services that cannot be fully known until earlier phases have been completed, making it impossible for agencies to complete all of AB 339's notification pauses at the outset of a project. These notices would therefore be compounded, causing projects to be delayed by multiples of the 60-day pause before a shovel ever touches the ground. Since the bill applies to ***any***.services within the scope of work of the job classifications represented by the recognized employee organization, this will include instances in which none of an agency's employees currently, or ever, have performed those services. The vast majority of agencies lack the resources and expertise to have 100 percent of their design needs performed by its own engineers, planners, and other design professionals on staff. Should one of these agencies need to transfer responsibility for conducting vital design services – plan checking an application for a housing development permit, for example – could leave the agencies without qualified professional staff to perform those essential functions for at least 60 days. This may expose agencies to legal liability for failing to meet statutory deadlines or regulatory obligations as agencies could be barred from hiring expertise in time due to the 60—day pause. Recent amendments to AB 339 do not fully resolve these concerns.

The bill also deters local agencies from working in partnership with local community organizations, who are at the front lines of providing critical local services, and who are already under scrutiny by the federal government, adding considerable uncertainty to their ongoing financial viability. We value our partnerships with these organizations, as they often provide culturally competent outreach and direct services to groups that can be difficult to serve; these partnerships allow local agencies to maximize federal, state, and local resources to ensure that services reach those who need them most.

Finally, sponsors continue to assert that documents associated with a Request for Proposals (RFP), Request for Quotes (RFQ), contract extensions, and contract renewals are not disclosed to the public. In truth, RFPs and RFQs are typically public by nature and subject to competitive bidding processes and regulations, while contracts are almost always disclosable public records under the Public Records Act. ***We dispute that local agencies are inappropriately withholding public records and further disagree that local agencies are failing to comply with existing notification requirements under the MMBA. If either were true, there are already existing remedies for sponsors to address these issues.***

Like previous unsuccessful proposals that have sought to undermine local agencies' ability to contract for public services, AB 339 represents a sweeping change to the fundamental work of local governments, but we remain unaware of a specific, current, and widespread problem that this measure would resolve or prevent. We are keenly aware, though, of the very real harm that could result from this measure. AB 339 will not improve services, reduce costs, or protect employees. As a result, we are opposed. Should you have any questions about our position, please reach out directly.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

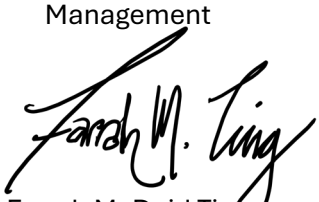
Sarah Dukett
Policy Advocate
Rural County Representatives of California

Sarah Bridge
Legislative Advocate
Association of California Healthcare Districts

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Johnnie Pina
Legislative Affairs, Lobbyist
League of California Cities

Jason Schmelzer
Legislative Advocate
Public Risk Innovation, Solutions, and Management

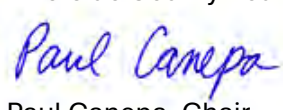


Farrah McDaid Ting
Deputy Director of Policy
County Health Executives Association of California

Candace Andersen, Chair
Contra Costa County Board of Supervisors

Joshua Pedrozo, Chairman
Merced County Board of Supervisors

Supervisor V. Manuel Perez, Chair
Riverside County Board of Supervisors



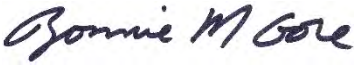
Paul Canepa, Chair
San Joaquin County Board of Supervisors

Erin Evans-Fudem
Legislative Deputy County Counsel
Office of the County Counsel
County of Santa Clara

Julia Bishop Hall
Director of State Legislative Relations
Association of California Water Agencies

Cory M. Salzillo
Legislative Director
California State Sheriffs' Association

Susan Parker, County Administrative Officer
County of Lake



Bonnie Gore, Chair (District 1)
Placer County Board of Supervisors

Elisia De Bord
Governmental Relations and Legislative Officer
County of Sacramento

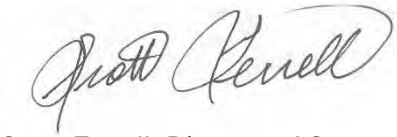
Connie Juárez-Diroll
Chief Legislative Officer
County of San Mateo

Eric P. Angstadt
CELSA
Executive Secretary

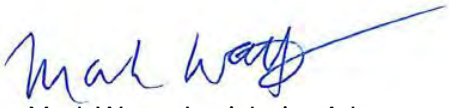
Peter M. Rietkerk, General Manager
South San Joaquin Irrigation District

Tyler Munzing, Director of Government Affairs
American Council of Engineering Companies of California

Noah Smith, PE, GE, President
California Geotechnical Engineering Association

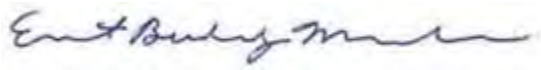


Scott Terrell, Director of Government Relations
The American Institute of Architects California

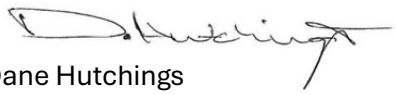


Mark Watts, Legislative Advocate
Transportation California

Matthew Wheeler, DPPD, Executive Director
California Building Officials (CALBO)



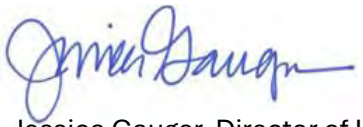
Buddy Mendes, Chairman
Fresno County Board of Supervisors



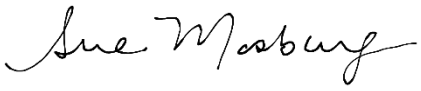
Dane Hutchings
Legislative Representative
California Association of Recreation and Park Districts

Michael Pimentel, Executive Director
California Transit Association

Dawn Rowe, Chairman
County of San Bernardino

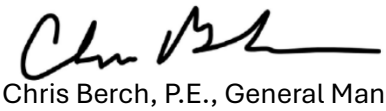


Jessica Gauger, Director of Legislative Advocacy & Public Affairs
California Association of Sanitation Agencies



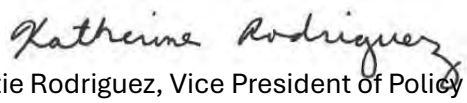
Sue Mosburg, Executive Director
American Water Works Association, California-Nevada Section

Brian Olney, General Manager
Helix Water District



Chris Berch, P.E., General Manager
Jurupa Community Services District

Karen Lange, Legislative Advocate
California Animal Welfare Association



Katie Rodriguez, Vice President of Policy and Government Relations
California Association of Public Hospitals and Health Systems (CAPH)

Philip M. Fine, Ph.D.
Executive Officer/APCO
Bay Area Air District

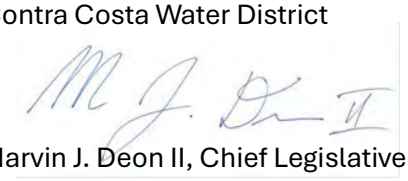
Joubin Pakpour
Director
American Public Works Association — California Chapters

Elizabeth Espinosa
Legislative Advocate
County of Ventura

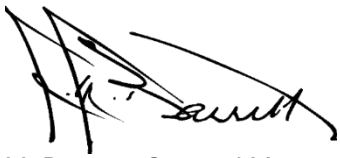
Stephanie Stephens
Exeuctive Director
California Park and Recreation Society

Ernesto A. Avila, Board President
Contra Costa Water District

Yazdan Emrani, Region 9 Director
American Society of Civil Engineers (ASCE-Region 9



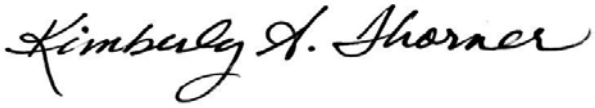
Marvin J. Deon II, Chief Legislative Representative
County of Los Angeles



J.M. Barrett, General Manager
Coachella Valley Water District

Faith Borges, Legislative Advocate
California Association of Joint Powers Authorities (CAJPA)

John Thiel, General Manager
West Valley Water District

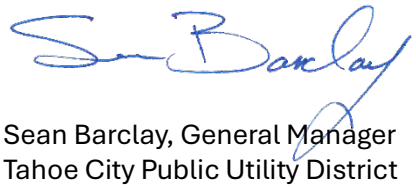


Kimberly A. Thorner, General Manager
Olivenhain Municipal Water District

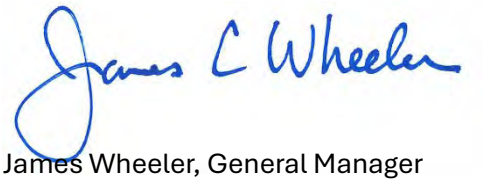
Gary Arant, General Manager
Valley Center Municipal Water District

Jose Martinez, General Manager
Otay Water District

Brett Hodgkiss, General Manager
Vista Irrigation District



Sean Barclay, General Manager
Tahoe City Public Utility District



James Wheeler, General Manager
Hayward Area Recreation and Park District

Jim Friedl, General Manager
Conejo Recreation and Park District

Jofil Borja, Environmental Legislative and
Regulatory Affairs Manager
Sacramento Area Sewer District

Greg Thomas, General Manager
Elsinore Valley Municipal Water District

Chris O'Connor, Senior Vice President,
Government & Industry Affairs
Associated General Contractors

cc: Members and Consultants, Senate Appropriations Committee
The Honorable Liz Ortega, California State Assembly

August 6, 2025
The Honorable Anna Caballero
Chair, Senate Judiciary Committee
1021 O Street, Room 412
Sacramento, CA 95814

RE: **AB 340 (Ahrens) Employer-Employee Relations Confidential Communications.**
OPPOSE *(As Amended March 5, 2025)*

Dear Senator Caballero,

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), the Association of California Healthcare Districts (ACHD), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Association of Joint Powers Authorities (CAJPA), Public Risk Innovation, Solutions, and Management (PRISM), the California Association of School Business Officials (CASBO), the California

Association of Recreation and Park Districts (CARPD), California County Superintendents, the School Employers Association of California (SEAC), Small School Districts' Association (SSDA), Community College League of California, Schools Excess Liability Fund (SELF), and the University of California, write in respectful opposition to Assembly Bill (AB) 340. This bill would restrict an employer's ability to conduct internal investigations to the detriment of employees' and the public's safety and well-being, adding new costs and liability for public employers. Moreover, the substantive provisions of the bill create restrictions mirroring a privilege.

Previous Legislation and Previous Veto
Our concerns with AB 340 are consistent with the issues raised in response to previously introduced legislation, AB 2421 (Low, 2024), AB 729 (Hernandez, 2013), AB 3121 (Kalra, 2018) and AB 418 (Kalra, 2019). The issues are succinctly captured in the AB 729 veto message from Governor Brown, which states: "I don't believe it is appropriate to put communications with a union agent on equal footing with communications with one's spouse, priest, physician or attorney. Moreover, this bill could compromise the ability of employers to conduct investigations into workplace safety, harassment and other allegations."

New Costs and Added Liability for the State, Local Governments, and Schools
In order to conduct proper investigations that uphold the public's trust, protect against the misuse of public funds, and ensure the safety and well-being of both public employees and the public at large, it is critical that a public employer has the ability to interview all individuals with relevant information to ascertain the facts and understand the matter fully. AB 340 would increase investigation and litigation costs for the state as well as local governments and schools by creating incomplete investigations, since all appropriate employees with relevant information cannot be questioned. Costs and risks may also increase as conduct challenged as unlawful under the bill's provisions is adjudicated before the Public Employment Relations Board (PERB). Even for conduct that is not brought to PERB, AB 340 could lead to unknown and unbudgeted costs for the state, and costs to local governments and schools, for dispute resolution, attorney fees, arbitration, and other costs. In addition to legal costs, AB 340 could force the state, local agencies, and schools to review and, in some cases, update collective bargaining agreements and policies regarding workplace investigations and allowable communications between represented employees and their employer. For schools, this is a drain of Proposition 98 funding.

Inconsistent with PERB Decision
AB 340 states that its prohibition on employer questioning is intended to be consistent with, and not in conflict with, William S. Hart Union High School District (2018) PERB Dec. No. 2595. This is problematic for two reasons. First, the bill is not consistent with that PERB decision. That decision engaged in a circumstantial analysis to determine whether employer questioning related to a disciplinary investigation was prohibited or not, while weighing the employee's and the employer's interests. The bright line standard in the opinion was narrow in scope. AB 340 goes beyond that, forgoing any circumstantial analysis or weighing of interests, and exceeding the scope of any standards articulated by the decision. Second, we are not aware of evidence that PERB is denying the interests of employees on this issue, raising the question of whether a legislative solution is warranted.

Expansion of New One-Sided Standard
AB 340 would create a de facto prohibition on employers requesting a court to compel disclosure of purportedly confidential communications, which is the same

outcome as if the communication was privileged in those circumstances. This will have a significant impact on judicial and administrative proceedings.

Endangers Workplace Safety
AB 340 interferes with the ability to interview witnesses because it would prohibit public agencies from questioning any employee or "representative of a recognized employee organization, or an exclusive representative" about communications made in confidence between an employee and a "representative of a recognized employee organization, or an exclusive representative" in connection with representation relating to any matter within the scope of representation. While AB 340 includes a narrow exception for criminal investigations, and provides that it does not supersede Gov. Code 3303, many necessary investigations are still subject to the bill's limitations, putting safety at risk.

This bill would hinder employees who wish to voluntarily report information or testify in front of necessary misconduct investigations since an employer would be prohibited from certain lines of questioning. It would also limit the ability of public employers to carry out the requirements of recently enacted law, Senate Bill 553 (Cortese, 2023), which includes conducting investigations into workplace safety, harassment, and other allegations. As of January 1, 2025, SB 553 allows collective bargaining representatives standing to seek temporary restraining orders (TRO) in connection with workplace violence. AB 340 will create a problematic scenario wherein a TRO may be obtained but an employer could not fully investigate the underlying facts. AB 340 lacks guardrails to prevent potential conflicts of interest that could arise during employee safety issues.

Specific to local educational agencies, TROs are being sought by teachers and classroom aides against students with a disability, who may not have full control of their motor skills or have a cognitive impairment. School employers shared that their ability to gather details and intercede results in alternatives to a TRO that are more productive for their staff and students. Otherwise, school employers may be exposed to greater liability as they try to adhere to contractual agreements for a student's Individualized Educational Plan.

Administrative investigations are also critical tools for public agency employers when protecting minors under the supervision and care of their employees. As it relates to preventing childhood sexual assault and misconduct, perpetrators are not often caught in the act at a school site or facility but rather discovered through investigations conducted by the employer through either building evidence for what may lead to a criminal investigation or removing an employee before misconduct may occur. The current liability statewide for school employers alone is approximately $3 billion dollars and districts need every tool available to prevent future misconduct.

AB 340, as drafted, would tie the hands of school employers in seeking better options for student educational outcomes and taking proactive steps for general safety.

Making matters worse, employers may not even know they are acting contrary to AB 340's restrictions by communicating with staff, because only the employee or the representative would know or could decide when a communication was made "in confidence." This bill prohibits the asking of questions, without regard to an employer's prior knowledge that a specific question is prohibited by the bill. There is no requirement that a labor union or employee invoke AB 340 prior to alleging a violation. This could affect day-to-day activities and critical government operations.

For the reasons discussed above, the organizations listed below are respectfully

opposed to AB 340. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
aarona@csda.net

Eric Lawyer
Senior Legislative
Advocate
California State Association of Counties
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Jean Hurst
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Sarah Dukett
Policy Advocate
Rural County Representatives of California
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Johnnie Piña
Legislative Affairs, Lobbyist
League of California Cities
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Faith Borges
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Jason Schmelzer
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Cailtin Jung
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Brianna Bruns
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Dane Hutchings
Legislative Representative
California Association of Recreation and
Park Districts
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Mishaal Gill
Director of Policy and Advocacy
California Association of School
Business Officials
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Leilani Aguinaldo
Legislative Advocate
Schools Excess Liability Fund (SELF)
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Nick Romley
Legislative Advocate
Small School Districts' Association
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Andrew Martinez
Senior Director of Government Relations
Community College League of California
amartinez@ccleague.org

Mario Guerrero
Legislative Director, Business Operations
University of California
State Governmental Relations
Mario.Guerrero@ucop.edu

CC:

The Honorable Patrick Ahrens
Honorable Members, Senate Appropriations Committee
Robert Ingenito, Principal Consultant, Senate Appropriations Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

June 23, 2025

The Honorable Jesse Arreguín
Chair, Senate Human Services Committee
1021 O Street, Suite 6710
Sacramento, CA 95814

RE: Assembly Bill 346 (Nguyen): In-Home Supportive Services Licensed Health Care Professional Certification
As Amended May 23, 2025 – SUPPORT

Dear Chair Arreguín:

On behalf of the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write to in support of Assembly Bill 346 by Assemblymember Nguyen, which streamlines the process for In-Home Supportive Services (IHSS) clients to receive paramedical services.

California's population of adults aged 65 and older is projected to reach 25 percent of the population, or 8.6 million Californians, by 2030. IHSS is an important tool in meeting the goals set out in the Master Plan for Aging to enable this growing population to age with dignity and independence. Currently, nearly 730,000 IHSS providers deliver services to over 800,000 recipients in the state. This includes paramedical services such as the administration of medications, wound care, or injections, among others.

While the California Department of Social Services (CDSS) allows any licensed healthcare professional to sign off on the initial SOC 873 healthcare certification form required for a client to obtain IHSS, the department only allows limited types of healthcare professionals to sign the additional SOC 321 form required to authorize paramedical services. Specifically, only physicians, surgeons, podiatrists and dentists are authorized to sign this additional form.

The current requirements for authorizations of both the health care certification and paramedical forms can prevent timely delivery of services essential for the client's health. Counties cannot allow paramedical services without the second form, which can lead to significant delays for a client obtaining paramedical services from their IHSS provider. This delay can be exacerbated by overwhelmed healthcare systems.

AB 346 allows the same licensed health care professionals who currently sign the IHSS health care certification form to also sign the paramedical form. Aligning which licensed health care professionals may sign the paramedical and health care certification forms will reduce administrative barriers. By broadening the types of health care providers who are authorized to sign these forms, IHSS clients can have both forms signed at the same time by the same provider, thereby reducing delays, improving health outcomes and better fulfilling the goals of the IHSS program.

Having to make an extra visit to the doctor's office causes an undue burden for older and disabled clients. The passage of this bill would significantly reduce the wait time for services, reduce the amount of time staff would have to dedicate to the approval process, and even increase the opportunity of paramedical services to more individuals who struggle to obtain the necessary authorizations.

For these reasons, UCC and RCRC supports AB 346 and urges your "aye" vote. Please do not hesitate to reach out with any questions.

Sincerely,

Kelly Brooks-Lindsey
Legislative Representative
UCC
kbl@hbeadvocacy.com
916-753-0844

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org
916-447-4806

cc: The Honorable Stephanie Nguyen, Member, California State Assembly
Members and Consultants, Senate Human Services Committee

July 18, 2025

The Honorable Maggy Krell
Member, California State Assembly
1021 O Street, Room 5230
Sacramento, CA 95814

RE: Assembly Bill 416 – Removal of Opposition
As Amended July 17, 2025

Dear Assemblymember Krell:

On behalf of the Rural County Representatives of California (RCRC) and the Urban Counties of California (UCC), we are pleased to remove our opposition to your Assembly Bill 416 related to emergency physician training requirements and the Lanterman-Petris-Short (LPS) Act, in light of amendments taken in Senate Judiciary. Our associations appreciate your willingness to address our concerns.

If you should have any questions, please do not hesitate to contact us.

Sincerely,

SARAH DUKETT
Senior Legislative Advocate
RCRC
sdukett@rcrcnet.org

KELLY BROOKS-LINDSEY
Legislative Representative
UCC
kbl@hbeadvocacy.com

cc: Reyes Diaz, Principal Consultant, Senate Health Committee
Allison Whitt Meredith, Counsel, Senate Judiciary Committee
Tim Conaghan, Policy Consultant, Senate Republican Caucus

July 30, 2025

The Honorable Anna Caballero, Chair
Senate Appropriations Committee
1020 O Street, Suite 7620
Sacramento, CA 95814

Re: **AB 418 (Wilson): Property taxation: tax-defaulted property**
As amended 3/17/25 – SUPPORT
Set for hearing 8/18/25 – Senate Appropriations Committee

Dear Senator Caballero:

On behalf of the Urban Counties of California (UCC), the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC), we write to express our support for Assembly Bill 418 by Assembly Member Lori Wilson, a measure that preserves the ability of California counties to utilize Chapter 8 sales of tax-defaulted properties. These sales are used to dispose of challenging properties or to facilitate the development of affordable housing or other local agency uses; AB 418 ensures that the owners of such properties are able to participate in an administrative process if they disagree with the tax sale value established by the tax collector and proposed for approval by the Board of Supervisors.

This important measure seeks to address the 2023 Supreme Court decision *Tyler v Hennepin County, Minnesota*, in which the plaintiff's constitutional rights were violated when Hennepin County auctioned her tax-defaulted property to satisfy the delinquent property tax debt of $15,000. The property sold for $40,000 and the County kept the remaining $25,000 in excess proceeds without first affording the plaintiff the opportunity to file a claim for the excess proceeds. The Court found that the taking of the excess proceeds violated the Takings Clause of the Fifth and Fourteenth Amendments and the Excessive Fines Clause of the Eighth Amendment.

Unlike the laws in Minnesota, California's laws require that if a property is sold at a tax auction, any proceeds from the auction that remain after all delinquencies are paid are then made available to parties of interest (i.e. the owner) of that property, and those parties have one year to file a claim for those excess proceeds. Under current law, a county is prohibited from depriving a property owner of their excess proceeds without first

providing public notice and certified mailing to the last known address, notifying the owner of the existence of excess proceeds and of the one-year timeframe to file a claim.

In California, there are thousands of tax-defaulted properties that hold little to no value or otherwise present specific or unusual challenges to dispose of through a traditional tax auction. Using a Chapter 8 tax sale process to dispose of such properties can make the most sense for the local agency and for the property owner. AB 418 outlines a procedure by which California's county tax collectors will utilize during the Chapter 8 sale process to ensure that the property is disposed of in a manner that is transparent and affords property owners an administrative remedy if the property owner disputes the price set at a Chapter 8 tax sale. These additional steps, which include a hearing before the Board of Supervisors where a party of interest may present evidence to dispute the tax sale price, offers an administrative process for property owners, while preserving the tax collector's informed discretion to utilize available options to manage those properties for which appraisals are not financially feasible.

AB 418 ensures that counties can effectively conduct Chapter 8 sales without the threat of litigation and Public Records Act requests that have recently been associated with these sales. The bill not only contains costs at the county level but ensures the fair collection and allocation of taxes for all local taxing entities. As a result, our associations strongly support this measure to address the uncertainty that currently exists and resolve this issue in a manner that ensures fairness and efficiency.

We respectfully urge your "aye" vote on AB 418.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

Sarah Dukett
Policy Advocate
Rural County Representatives of California

cc: Members and Consultants, Appropriations Committee

The Honorable Lori Wilson, California State Assembly

URBAN COUNTIES
OF CALIFORNIA

2025 UCC Leadership

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

June 20, 2025

The Honorable Tina McKinnor
California State Assembly
1021 O Street, Suite 5520
Sacramento, CA 95814

Re: **AB 470 (McKinnor): Telephone corporations: carriers of last resort**
As amended 6/19/25 – REMOVAL OF OPPOSITION
Set for hearing 6/23/25 – Assembly Communications and Conveyance Committee

Dear Assembly Member McKinnor:

On behalf of the Urban Counties of California (UCC), I write to communicate our removal of opposition to your AB 470, regarding the Carrier of Last Resort obligations of California telecommunications companies. We greatly appreciate the considerable efforts that you, your staff, committee staff, and leadership staff, along with our colleagues at the Rural County Representatives of California and the telecommunications companies have expended to arrive at the language recently amended into the bill. We are particularly grateful for the recognition that there are rural and underserved areas of our urban counties that are important to consider when discussing policies associated with deployment of new communication technologies. As a result, UCC has removed its opposition to AB 470 and are grateful for your willingness to work through these challenging issues.

Please reach out if you have any questions about our position. We will continue to engage on the measure as AB 470 moves through the legislative process.

Sincerely,

Jean Kinney Hurst
Legislative Advocate

cc: The Honorable Tasha Boerner, Chair, Assembly Communications and Conveyance Committee
Members and Consultants, Assembly Communications and Conveyance Committee
Chase Hopkins, Policy Consultant, Office of Assembly Speaker Robert Rivas

1127 11TH STREET,
SUITE 810
SACRAMENTO, CA 95814
916.327.7531
URBANCOUNTIES.COM

July 6, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, 412
Sacramento, CA 95814

RE: AB 538 (Berman): Public works: payroll records
As Amended May 23, 2025 – OPPOSE
Set to be heard in the Senate Appropriations Committee July 7, 2025

Dear Senator Caballero,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), and the California Special Districts Association (CSDA) respectfully oppose Assembly Bill (AB) 538 because it would place an unnecessary burden on local agencies.

Current law requires contractors and subcontractors for public works projects to maintain payroll records for all workers employed as part of a public works project. Current law also requires that a certified copy of those records be made available upon request by either a body awarding the contract (e.g. a county or city) or by the Division of Labor Standards and Enforcement (DLSE). Current law empowers DLSE, not awarding bodies, to penalize contractors or subcontractors for failing to respond to a records request by either an awarding body or DLSE. Despite this reality, the bill only requires local agencies to seek out records not in their possession and lacks any language to compel the only body with enforcement powers, DLSE, to seek out the records.

Additionally, Section 2 declares that the bill is not a reimbursable state mandate, asserting that the only costs incurred by a local agency or school district will be due to changes to a crime or infraction. We disagree. While the proposed amendment to Labor Code § 1776 (b)(4) provides that non-compliant contractors shall have progress payments withheld in accordance with the existing penalty established in Labor Code § 1776(h), it is clear that the adjustment to how penalties may be assessed are not the *only costs that may be incurred by a local agency.* The bill clearly mandates a new activity by local agencies: seeking records from a public works contractor or subcontractor when the local agency is not in possession of those records, redacting those records, and providing them to the requesting entity.

Additionally, the provisions relied upon for this incorrect assumption (Gov. Code, § 17556, subd. (g)), is itself constitutionally suspect. The State's subvention requirements and exemptions to those requirements are established by the California Constitution (Cal. Constit., art. XIIIB, § 6.) As relevant here, that provision only exempts from the subvention requirement "legislation defining a new crime or changing an existing definition of a crime." Section 17556(g) goes beyond the constitutional exemption from the subvention requirement by including the provision relied upon by the author here: a change in the penalty for a crime or infraction.

Given this concern, CSAC urges the committee members and consultants not to adopt an overly broad a reading of Section 17556(g) and consider the full costs of this bill, which include significant direct costs to the state and ongoing reimbursable costs to local governments. In total, the bill would directly cost the state $876,000 in the

first year and $828,000 ongoing for implementation by DLSE and lead to unknown, but potentially significant, ongoing costs to reimburse local governments for the new mandated service.

Additionally, we believe the language in Section 2 should be amended to clearly declare that the bill would establish a new mandate reimbursable under state law. While, ultimately, the decision on whether or not a bill is a state mandate rests on the Commission on State Mandates' consideration of actual implementation of a bill, and not on the assertions in bill language, we believe this amendment more appropriately accounts for the bill's true impacts.

In closing, we believe this bill unnecessarily adds to the administrative burdens of local agencies at a time when their resources are being further stretched due to increasing state mandates, emergency response, and federal uncertainty.

For these reasons, CSAC, UCC, RCRC, Cal Cities, and CSDA regretfully oppose AB 538 (Berman) and respectfully request your NO vote. Should you have any questions or concerns regarding our position, please do not hesitate to contact us.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Kinney Hurst
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Damon Conklin
Legislative Advocate
League of California Cities
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Anthony Tannehill
Legislative Representative
California Special Districts Association
anthonyt@csda.net

cc: The Honorable Marc Berman, California State Assembly
Members and Consultants, Senate Appropriations Committee

June 30, 2025

The Honorable Jesse Arreguín
Chair, Senate Committee on Human Services
1021 O Street, Suite 6710
Sacramento, CA 95814

RE: AB 607 (Rodriguez): CalWORKs Home Visiting Program
As Introduced — SUPPORT
Set for Hearing June 30, 2025 in Senate Human Services Committee

Dear Chair Arreguín:

On behalf of the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write in support of Assembly Bill 607 by Assemblymember Celeste Rodriguez, related to Home Visiting Programs (HVPs). This bill would extend the timeframe in which children may be enrolled and the period in which CalWORKs families are eligible to participate in HVPs.

Home Visiting Programs match trained professionals with expecting and new parents to help them with critical early development for their children. This includes offering resources, mentoring, cultural community building, and other supports that utilize parent's strengths and build skills. Research shows that participation in an HVP has immense benefits to children under 2 years old and their families, such as better maternal and infant health, reduced emergency room visits, and increased safety practices. Long term, for children who participate to age 5, research shows improved language and cognitive development, improved math and reading scores, reduced absenteeism, and decreased school suspensions. For every dollar invested in HVPs, communities receive a benefit of up to five dollars in savings in child welfare, K-12 education, and community safety.

There are two Home Visiting Programs funded by the state: the California Home Visiting Program (CHVP) managed by the Department of Public Health and the CalWORKs Home Visiting program (HVP) managed by the Department of Social Services. The CHVP under CDPH follows models that allow families to remain in the program until the child turns five years old. Under existing law, however, the CalWORKs HVP can only be offered to pregnant individuals and families with a child under 24 months of age. Those families may receive CalWORKs HVP services for 24 months or until the first enrolled child's second birthday, whichever is later. There are presently 41 counties administering CalWORKs HVP.

Children and families participating in CalWORKs HVP miss out on the critical developmental benefits that result from continued participation. Families that would otherwise like to remain involved in the CalWORKS HVP are forced out of the program due to the statutory time limit. Although it is possible they may transition to another HVP funded by CDPH or another community-based organization, that is only possible if there is funding and space available in those programs. Furthermore, research shows interruption to participation in a home visiting program leads to families dropping out.

AB 607 extends the duration of the home visiting program to at least 24 months, not to exceed the duration of the applicable home visiting program model, rather than for 24 months or until the child's second birthday. The bill also expands the eligible population to include an individual who is a parent or caretaker relative of a child less than 36 months of age, rather than 24 months of age, at the time the individual enrolls in the program. Finally, AB 607 allows children whose participation would otherwise be terminated because the family no longer meets CalWORKs income, eligibility, or need criteria to continue through the duration of the program or for up to an additional 12 months, whichever is longer.

This bill will help to maximize the health and developmental benefits of this highly effective program for families in need across the state. For these reasons, UCC and RCRC support AB 607. Please do not hesitate to reach out with any questions.

Sincerely,

Kelly Brooks-Lindsey
Legislative Representative
UCC
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916-753-0844

Sarah Dukett
Policy Advocate
RCRC
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916-447-4806

cc: The Honorable Celeste Rodriguez, Member, California State Assembly
Members and Consultants, Senate Human Services Committee
Joe Parra, Consultant Senate Republican Caucus

July 10, 2025

The Honorable Maria Elena Durazo
Chair, Senate Local Government Committee
State Capitol, Room 407
Sacramento, CA 95814

RE: **AB 610 (Alvarez) Housing element: governmental constraints: disclosure statement.**
OPPOSE UNLESS AMENDED *(As of 7/3/25)*

Dear Chair Durazo,

The League of California Cities (Cal Cities), the Rural County Representatives of California (RCRC), the Urban Counties of California (UCC) and the American Planning Association California Chapter (APA CA) **regretfully must take a position of oppose unless amended** on measure **AB 610**, which would impose unworkable analytical requirements on local governments' housing elements, with unclear benefits to housing planning and production.

Specifically, AB 610 would require local governments to speculate about future actions during the 8-year housing element planning period by requiring a detailed analysis of any *future potential* governmental constraints. It is unclear why this requirement is needed. Existing housing element law already requires local agencies to identify and, where appropriate and legally possible, to remove governmental constraints. Existing law also provides an avenue for the Department of Housing and Community Development (HCD) to decertify a local government's housing element if it takes an action that is inconsistent with its housing element.

Cities and counties work diligently with HCD to draft housing plans accommodating their fair share of housing at all income levels. These extensive and complex plans can take years to develop, including public engagement and environmental review. Local governments go to great lengths to ensure that their housing elements substantially comply with the ever-evolving housing element law. This measure would increase the complexity of the housing element review process by requiring local agencies to consider any potential

new regulations for the next eight years. It almost guarantees that housing elements will not be adopted by the statutory deadline.

Local governments must respond to community needs, events, and experiences. AB 610 would create a rigid and unworkable framework that attempts to bind the actions of future councils or boards of supervisors. The bill is also based on an inaccurate premise that the housing element requires removal of *all* potential governmental constraints on housing. This is not the case. In fact, many policies that help to achieve housing element goals can also potentially constrain housing production. Examples include inclusionary zoning or in-lieu fees to support affordable housing, tenant protection ordinances, accessibility requirements to ensure that residents with disabilities can find adequate housing, impact fee programs to provide necessary infrastructure and meet ever-evolving state mandates. Local governments must have flexibility to meet changing conditions that affect the availability and affordability of safe and decent housing at all income levels.

AB 610 also fails to account for the constantly changing suite of statewide planning mandates approved by the Legislature. These mandates, including those in AB 610, are nearly always unfunded, as local governments are presumed to be able to recoup their costs by passing them on as development fees. AB 610's definition of a "covered governmental constraint," would include any fee, exaction, or affordability requirement as defined in Government Code Section 65940.1 and would generally preclude any changes during the 8-year planning period. This includes parkland dedication for new development, park fees, Mello-Roos special taxes (which already must be approved by landowners), inclusionary housing requirements, and all development impact fees. This measure would prohibit local governments from responding to their community to current events in housing policy by making null and void any proposed regulations that were not disclosed in the housing element.

For these reasons, Cal Cities, RCC, UCC and APA CA **regretfully must take a position of oppose unless amended** on AB 610. We appreciate the author's willingness to work with stakeholders to address these concerns and have proposed amendments that would remove our opposition. If you have any questions, please Brady Guertin (Cal Cities) at bguertin@calcities.org, Tracy Rhine (RCRC) at trhine@rcrcnet.org, Chris Lee (UCC) at clee@politicogroup.com, or Lauren De Valencia at lauren@stefangeorge.com.

Sincerely,

Brady Guertin
Legislative Affairs, Lobbyist
Cal Cities

Reuben Duarte
Vice President Policy and Legislation
APA California

Tracy Rhine
Senior Policy Advocate, RCRC

Christopher Lee
Legislative Advocate, UCC

Mark Neuburger

Legislative Advocate, CSAC

Cc: The Honorable David Alvarez
Members, Senate Local Government Committee

July 17, 2025

Senator Anna Caballero
Chair, Senate Committee on Appropriations
State Capitol, Room 412
Sacramento, CA 95814

RE: AB 690 (Schultz) Criminal procedure: indigent defense compensation
As amended on May 23, 2025 – OPPOSE.
Senate Appropriations Committee Suspense File

Dear Chair Caballero,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we write in respectful opposition to Assembly Bill (AB) 690 (Schultz). While we share the overarching policy intent, this bill would create additional mandates for the provision of indigent defense services, which will result in increased, unknown, yet significant cost pressures to counties statewide.

The California and U.S. Constitution enshrine the right to effective assistance of legal counsel and equal protection through due process for all criminal defendants, prior to being deprived of their liberty. Thus, the government is required to provide access to attorneys and pay for the cost of representation for those who cannot afford counsel. In California, the state has delegated to counties the responsibility of both funding and administering indigent defense services at the trial court level. Counties have the authority and flexibility to design systems that best suit local needs. However, California is only one of four states that does not provide full or partial funding to counties for the delivery of the constitutionally promised service. Despite the fact that the state has shifted the primary responsibility to provide indigent defense to counties, in 2020, a California Superior Court determined that the state still has a responsibility to fulfill its constitutional duties. Although the provisions in AB 690 seek to improve the quality of criminal defense in California, the state's responsibility in helping ensure that this goal is met is absent.

As drafted, AB 690 makes four main changes, which will inevitably have a fiscal impact on counties:

First, this measure would require counties to adhere to recently published standards drafted by the Office of the State Public Defender (OSPD), whose mission is to provide support and technical assistance to counties, rather than develop rules on how county government administers indigent defense services. The ten new standards impose vast changes around leadership, organizational structure, classification of attorneys, defense panel procedures, program oversight and guidance, training and attorney development, data collection, access to resources, attorney compensation, and attorney-client communication. Not all counties are equipped with the resources to meet the stringent and comprehensive strategies absent state investments.

Second, this bill would establish several expansive new requirements counties must incorporate into any contractual agreement with private firms and non-county attorneys. This includes, but is not limited to, access to funding for ancillary services on top of general attorney compensation – investigators, social workers, immigration counsel, as well as payment for paralegals, case support services, and mitigation specialists, which – in our view – should be accounted for as part of standard operating costs for private contractors. Again, without state support, this will increase county general fund costs for the provision of a state mandated service.

Third, and arguably one of the most critical provisions of this measure is the establishment of a blanket prohibition on the utilization of flat fee or per-case compensation models when contracting out or administering indigent defense services. This aspect of the measure would have an immediate and direct impact, particularly in the hardest to serve areas of our state, where it is increasingly difficult to recruit and retain experienced criminal defense counsel. For example, in counties where a flat fee contract model is utilized, attorneys express support for the security it provides during periods when there may be a declining caseload. Simply put, the flat fee prohibition reduces county-by-county flexibility and poses additional challenges to the already shrinking pool of qualified defense attorneys. As currently drafted, the bill fails to identify practical and alternative models that would meet the fiscal restrictions of any given county, nor does it demonstrate that alternative models will automatically yield higher quality defense and a return on the higher investment necessary to recruit and retain qualified attorneys.

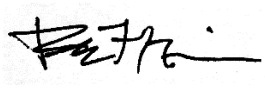
Lastly, this measure would require biannual reporting of every single county contract for indigent defense services to the OSPD, again, without new resources or state funding.

Overall, the combined provisions in AB 690 dramatically reduce county authority over the constitutionally mandated service that the state has delegated to counties, without any meaningful funding. The requirements are not only costly, but some are simply not feasible due to the diverse challenges facing our 58 unique counties with regards to population, geography, crime trends, workforce shortages, and budgetary constraints.

While counties share the underlying intent of AB 690 – to ensure there are manageable caseloads for defense attorneys and high-quality representation for all clients statewide – the bill imposes considerable changes that must be funded through the Legislature prior to counties being able to make the necessary contractual and system-wide changes that this measure would demand. Ultimately, when many of our counties are struggling to sustain critical programming and ensuring the continued delivery of essential services for our most vulnerable communities, now is not the time to pass additional unfunded mandates.

For these reasons, CSAC, UCC and RCRC regretfully oppose AB 690. Should you have any questions regarding our position, please do not hesitate to contact us at rmorimune@counties.org, ehe@hbeadvocacy.com, or sdukett@rcrcnet.org.

Sincerely,



Ryan Morimune	Elizabeth Espinosa	Sarah Dukett
Senior Legislative Advocate, CSAC	Legislative Advocate, UCC	Policy Advocate, RCRC

CC: Members and Consultants, Senate Committee on Appropriations
The Honorable Nick Schultz, California State Assembly

July 11, 2025

The Honorable Sabrina Cervantes, Chair
Senate Elections and Constitutional Amendments
1020 N Street, Room 533
Sacramento, CA 95814

Re: **AB 699 (Stefani): Elections: local tax measures.**
As amended July 3, 2025 - SUPPORT
Set to be heard in Senate Elections and Constitutional Amendments on July 15, 2025

Dear Senator Cervantes:

On behalf of the California State Association of Counties and the Urban Counties of California, we write to express our support for Assembly Bill (AB) 699, which will allow election officials to refer voters to the Voter Information Guide for detailed tax rate information rather than requiring the lengthy tax rate information to appear directly on the ballot. This would increase transparency by giving more information to voters for local bond and tiered-rate tax measures.

Current law requires counties to include very specific financial and technical information in each 75-word ballot label, including the amount of money to be raised annually by the tax and the rate and duration of the tax. However, the 75-word limit can be too restrictive for accurately and clearly summarizing complex tax and bond measures, which can lead to voter confusion and misinterpretation of the proposals.

AB 699 would improve ballot transparency for local bond and tax measures, giving voters more information about how the measures would affect their taxes. The provisions of this bill would allow local agencies to do this by including in the ballot

label the words “See voter guide for measure information statement” and then providing detailed information about the measure’s effects on taxes in the voter guide.

This bill would not only give local agencies the alternative to remove the confusing language currently required, it would give them the opportunity to provide more, and clearer, information in the voter guide so voters can make informed decisions.

For these reasons, we are proud to support AB 699 and respectfully request an AYE vote. Should you have any questions about our position, please do not hesitate to contact us.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

CC: The Honorable Catherine Stefani
Members and Consultants, Senate Elections and Constitutional Amendments Committee
Scott B. Matsumoto, Principal Consultant, Senate Elections and Constitutional Amendments Committee
Cory Botts, Consultant, Republican Caucus

July 7, 2025

The Honorable Caroline Menjivar
Chair, Senate Health Committee
1021 O Street, Suite 6630
Sacramento, California 95814

RE: AB 836 (Stefani): Midwifery Workforce Training Act
As Amended June 23, 2025 – SUPPORT

Dear Chair Menjivar:

On behalf of the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write to in support of Assembly Bill 836 by Assembly Member Stefani, which is related to midwifery education.

Specifically, AB 836 would require the Department of Health Care Access and Information (HCAI), upon appropriation from the Legislature, to administer funding for a statewide study on midwifery education. Additionally, the bill would require the study to be conducted by an outside consultant familiar with the health care and midwifery landscapes and workforce in California that would, among other things, identify viable education programs that can serve both rural and urban geographic areas.

The shortage of health professionals in California, and particularly the rural areas of the state, has been a persistent concern for many years, and has become more acute in recent years due to the COVID-19 pandemic and the aging of the health care workforce. Rural areas with smaller populations that are farther from urban centers often have the lowest supply of health professionals per capita. Further, rural California does not have a high concentration of the four-year universities needed for graduate degree health professionals. Health care workforce shortage problems are not isolated to rural areas. The Inland Empire and the Central Valley are two of the fastest growing regions in California, and they are the two areas that have the lowest per capita health workforce. It's also a challenge to recruit and retain people in the Central Valley and Inland Empire that reflect the diversity and language capabilities of these regions.

Rural and underserved urban communities around California face a severe lack of access to reproductive health and maternity care. Between 2014 to 2024, more than 50 maternity units closed throughout the state. Midwifery care has demonstrated excellent clinical outcomes, but they are underutilized and can be mobilized to help address provider shortages. California currently only has one nurse-midwifery program accepting students: the California State University Fullerton master's degree in nurse-midwifery. There are currently no licensed midwife programs in California. To fill the state's needs, midwifery education should aim to serve parts of the state with

the most significant provider shortages and maternity care needs. AB 836 would expand the conversation about health care workforce to examine viable paths for midwife education, which would benefit rural and urban areas of California.

For these reasons, UCC and RCRC supports AB 836 and urges your "aye" vote. Please do not hesitate to reach out with any questions.

Sincerely,

Kelly Brooks-Lindsey
Legislative Representative
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kbl@hbeadvocacy.com
916-753-0844

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org
916-447-4806

cc: The Honorable Catherine Stefanie, Member, California State Assembly
Members and Consultants, Senate Health Committee

July 8, 2025

The Honorable Nick Schultz
California State Assembly
1021 O Street, Suite 5150
Sacramento, CA 95814

RE: **AB 902 (Schultz) – Transportation Projects: Wildlife Corridors.**
REMOVAL OF OPPOSITION (*As amended July 8, 2025*)

Dear Assembly Member Schultz,

On behalf of the League of California Cities, the California State Association of Counties, Rural County Representatives of California, and the Urban Counties of California, we write to remove our opposition to Assembly Bill 902, as amended in Senate Natural Resources & Water Committee. We recognize the efforts made to acknowledge our mutual concerns, and we look forward to additional engagement as the bill progresses.

If you have any questions, please feel free to contact me at dconklin@calcities.org, Mark Neuburger at mneuburger@counties.org, Staci Heaton at sheaton@rcrcnet.org or Chris Lee at clee@politicogroup.com.

Sincerely,

Damon Conklin
Legislative Advocate
Cal Cities

Mark Neuburger
Legislative Advocate
California State Association of Counties

Staci Heaton
Senior Policy Advocate
Rural County Representatives of California

Christopher Lee
Legislative Advocate
Urban Counties of California

URBAN COUNTIES
OF CALIFORNIA

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

June 25, 2025

The Honorable Mark González
California State Assembly
1021 O Street, Room 6150
Sacramento, CA 95814

RE: AB 906 (Gonzalez) – Planning and zoning: housing elements: affirmatively furthering fair housing
As amended on June 23, 2025 – CONCERNS
Set for hearing in Senate Housing – July 1, 2025

Dear Assemblymember González:

The Urban Counties of California (UCC), a coalition of 14 of the state's most populous counties, writes to share our concerns with your Assembly Bill 906. We are supportive of the bill's fundamental goal of improving housing planning in support of affirmatively furthering fair housing. We are hopeful that the successful implementation of AB 906 would give local governments greater certainty that their housing element site inventories will comply with state law. We also appreciate recent amendments that address our prior timing-related concerns.

Unfortunately, we remain concerned that the bill's proposed site inventory analysis online tool is based exclusively on comparing the locations of sites in the inventory with the "proportion of land located in relatively higher income areas." Unincorporated counties have an abundance of land. While many of these sparsely populated areas have relatively higher incomes, they usually lack urban infrastructure necessary to accommodate significant housing development. This fact will negatively bias the analysis of county housing element site inventories pursuant to the bill.

As we have previously discussed with the sponsors of AB 906, UCC would prefer to address this shortcoming of the proposed tool by comparing the percentage of housing units in site the inventory located in higher-opportunity areas to a baseline of the *percentage of total residents* who live in such higher-opportunity areas. Adjusting for population in this manner would account for the fact that unincorporated counties include hundreds of thousands of acres of sparsely populated lands used for agriculture, natural resources, recreation, mining, and numerous other purposes incompatible with significant levels of housing production.

Indeed, the research paper that the sponsors have relied on as the basis for proposed tool was itself based on an analysis that adjusted for such factors: "The Fair Housing Land Use Score uses the land area in each neighborhood to weigh its importance, which makes it sensitive to mismeasurement of the same [land area]. For example, if high-opportunity neighborhoods have undevelopable terrain due to steep hills, a city's score will be biased downward. *We take this into account by removing land zoned for 'open-space and public lands' in the California Statewide Zoning map or identified as protected by the California Protected Areas Database*."[i]

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SACRAMENTO, CA 95814
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URBANCOUNTIES.COM

Moreover, the research paper also departs from the bill in two other significant ways. First, the paper entirely excluded unincorporated areas from the study, instead analyzing only city zoning and site inventories.[ii] Second, the research paper analyzed lands available for development based on measures of income, race, environmental quality, and transportation access when determining whether a local site inventory affirmatively furthered fair housing, while AB 906 focuses exclusively on lands in higher-income areas. Including a measure of transportation access would also help address county concerns with the potential biases of the proposed tool.

While the most straightforward way to address our concerns would be the population-weighting discussed above, another approach would be requiring the analysis to exclude unincorporated lands unsuitable for significant housing development:

> *(h) (2) (C) For unincorporated areas, the Department shall exclude protected public lands, lands that are not served by public sewer and water systems, and lands designated by the applicable general plan for agriculture, open space, mining and resource extraction, or natural resources purposes when calculating the proportion of land located in relatively higher income areas pursuant to paragraph (1).*

Thank you for your continued consideration of our concerns. Please contact me at clee@politicogroup.com with any questions about our position.

Sincerely,

Christopher Lee
Legislative Advocate

cc: Honorable Members, Senate Housing Committee
Consultants, Senate Housing Committee
Consultant, Senate Republican Caucus

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[i] *The Fair Housing Land Use Score in California: An Evaluation of 199 Municipal Plans. UCLA Lewis Center for Regional Policy Studies. October 2024. Page 16.*

[ii] *"We ultimately use the housing elements for the 199 incorporated cities that have less than 10% geocoding errors and where the population is at least 15,000." IBID. Page 16.*

July 10, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: AB 1048 (Chen) – Independent Bill Review and Contract Disputes
OPPOSE

Dear Senator Caballero,

The undersigned organizations respectfully **OPPOSE** your **AB 1048**, which would expand the types of billing disputes subject to the Independent Bill Review (IBR) process that exists within the workers' compensation system. Our organizations represent a broad base of California's public and private sector employers that have an interest in the workers' compensation and advocate for a balanced workers' compensation system that provides injured workers with fair benefits, while keeping costs low for employers. Our members include not only businesses of every size, but also cities, counties, schools, and other public entities.

Employers are broadly supportive of the IBR process because it reduces unnecessary litigation on simple billing disputes. IBR typically addresses issues related to coding, bundling of services, and application of the official medical fee schedule. Under AB 1048, however, IBR would also be asked to resolve complicated contract disputes related to billing. IBR reviewers are typically insurance and billing professionals who are quite good at resolving routine billing issues. IBR is not, however, staffed by attorneys and judges who are able to resolve legal disputes around contract application.

Many of the contracts subject to IBR under AB 1048 have binding dispute resolution provisions that would be interfered with by funneling the disputes into IBR. These provisions can include internal appeals processes, arbitration, and/or venue selection for

dispute resolution. In fact, Labor Code Section 5275(b) specifically allows parties in the workers' compensation system to agree to arbitration to resolve disputes. From our perspective it is bad public policy to move these disputes from qualified arbitrators or judges and into the IBR system.

AB 1048 ignores contracted dispute resolution provisions and instead forces these disputes into an IBR process that isn't built for contract disputes. For these reasons, and more, we respectfully **OPPOSE** your **AB 1048**.

Sincerely,

Laura Curtis, American Property Casualty Insurance Association
Faith Borges, California Association of Joint Powers Authorities
Ashley Hoffman, California Chamber of Commerce
Jason Schmelzer, California Coalition on Workers' Compensation
Benjamin Ebbink, California League of Food Producers
Jen Hamelin, Public Risk, Innovation, Solutions, and Management
Leilani Aguinaldo, Schools Excess Liability Fund
Jean Hurst, Urban Counties of California

July 8, 2025

The Honorable Anna Caballero
Chair, Senate Appropriations Committee
1021 O Street, Room 412
Sacramento, CA 95814

RE: **AB 1109 (Kalra) Evidentiary Privileges: Union Agent-Represented Worker Privilege.**
OPPOSE *(As Introduced February 20, 2025)*

Dear Chair Caballero,

The California Special Districts Association (CSDA), League of California Cities (Cal Cities), California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), Association of California School Administrators (ACSA), University of California, Association of California Healthcare Districts (ACHD), California Association of Recreation and Park Districts (CARPD), School Employers Association of California (SEAC), California School Boards Association (CSBA), California County Superintendents, Small School Districts' Association (SSDA), Alameda County Office of Education, Dublin Unified School District,

Pleasanton Unified School District, Community College League of California, California Association of Joint Powers Authorities (CAJPA), Schools Excess Liability Fund (SELF), Public Risk Innovation, Solutions, and Management (PRISM), California Association of School Business Officials (CASBO), and the University of California, write to inform you of our respectful opposition to Assembly Bill (AB) 1109 (Kalra). This bill would inhibit an employer's ability to conduct investigations to the detriment of employees' and the public's safety and well-being, add new costs and liability for public employers, and interfere with administrative and judicial proceedings necessary to protect the public's interest and public agencies' duty to be responsible stewards of public funds.

Previous Legislation and Previous Veto
Our concerns with AB 1109 are consistent with the issues raised in response to previously introduced legislation, AB 729 (Hernandez, 2013), AB 3121 (Kalra, 2018) and AB 418 (Kalra, 2019), AB 2421 (Low, 2024), and AB 340 (Ahrens, 2025). The issues are succinctly captured in the AB 729 veto message from Governor Brown, which states: "I don't believe it is appropriate to put communications with a union agent on equal footing with communications with one's spouse, priest, physician or attorney. Moreover, this bill could compromise the ability of employers to conduct investigations into workplace safety, harassment and other allegations."

New Costs and Enhanced Impacts for the State, Local Governments, and Schools
In order to conduct proper investigations that uphold the public's trust, protect against the misuse of public funds, and ensure the safety and well-being of both public employees and the public, it is critical that a public employer has the ability to interview all individuals with relevant information to ascertain the facts and understand the matter fully. AB 1109 would increase investigation and litigation costs for the state as well as local governments and schools due to incomplete investigations, because appropriate witnesses may refuse to disclose relevant information based on a faulty or incorrect understanding of AB 1109. For schools, this is a drain of Proposition 98 funding.

Although AB 1109 provides that a union agent may reveal a confidential communication made to the agent if required to do so by a court order, this provision notably fails to include "a represented employee or former represented employee" as a party that could be compelled to reveal a confidential communication between the employee and union agent pursuant to a court order. Moreover, this provision would add significant costs to the state, local governments, and schools, requiring them in some cases to expend resources to obtain a court order to reveal allegedly "confidential communications" related to otherwise routine workplace investigations as discussed further below.

Creation of New One-Sided Standard, Lacking Important Safeguards
The scope of privilege akin to an attorney-client relationship is carefully defined by state law. Privilege is by design narrow in scope to protect the confidentiality and integrity of relationships, both medical/professional and familial in nature, where highly sensitive and deeply personal information is exchanged. AB 1109 fails to recognize this well-established threshold for creating a right of privilege and instead would create a new, broad privilege for public employees and their unions, without requisite limits on how the privilege functions.

Unlike other privileges that apply to both sides of the litigation or proceedings such as the attorney-client privilege, AB 1109 does not bestow the same privilege upon management-labor negotiator communications, or communications among members of management regarding labor union disputes or grievance issues. Consequently, in labor related proceedings before courts and the California Public Employment Relations Board (PERB) hearings, an employer could be forced to disclose all such communications, while the union or employee could shield relevant and otherwise

discoverable communications from disclosure pursuant to the terms proposed in AB 1109.

The bill would also impede a public employer's ability to defend itself or assert its interests in other adversarial processes given that the bill applies to compelled disclosures to any court or to any administrative board or agency, or in any arbitration or other proceeding. Proceeding is defined in Evidence Code Section 901 to mean "any action, hearing, investigation, inquest, or inquiry (whether conducted by a court, administrative agency, hearing officer, arbitrator, legislative body, or any other person authorized by law) in which, pursuant to law, testimony can be compelled to be given." The word "grievance" is included in the bill for purposes of defining a covered union agent, adding more uncertainty as to the types of matters covered by the bill.

AB 1109 is lacking important guardrails commonly applicable to other privileges in the professional context, including:

- The lack of standards to prevent the potential for conflict between the proposed union agent privilege and the union agent's duty to represent the bargaining unit as a whole. A union agent could not reconcile the privilege of one employee with his or her duty to represent a second employee if those employees are adverse to each other. The potential for conflict is further exacerbated because, unlike attorney-client privilege where the client is the holder of the privilege, AB 1109 would make both the union agent and the employee holders of the privilege.
- The lack of education, training, certification or qualifications required for a union agent to hold the privilege under AB 1109. Other professional, non-familial privileges require years of education, certification and training.
- The lack of enforcement mechanisms, such as sanctions or penalties, to ensure proper use and observance of the privilege. With the other professional privileges, there is typically a disciplinary or licensing body with the authority to take corrective action in the event the privilege is abused or misused. There is no such mechanism in AB 1109.

Taken together, AB 1109's expansion of the evidentiary privilege is anything but straightforward, raising irreconcilable conflicts and concerns not present with established evidentiary privileges.

Endangers Workplace Safety
AB 1109 potentially interferes with the ability to obtain information from witnesses relevant to workplace safety and other matters. The bill permits the silencing of employees who wish to voluntarily report knowledge or information related to an incident or from testifying because it provides that "[a] represented employee or represented former employee also has a privilege to prevent another from disclosing a confidential communication between the employee and a union agent that is privileged pursuant to this section." While AB 1109 includes narrow exceptions for criminal proceedings, the disclosure of many important communications may be hindered by the bill's limitations, putting safety at risk. Shockingly, the bill's exception providing that there is no privilege if the union agent reasonably believes that disclosure is necessary to prevent a criminal act that the union agent reasonably believes is likely to result in death or substantial bodily harm leaves employee safety entirely to the discretion of the union agent.

This bill would also limit the ability of public employers to carry out the requirements of recently enacted law, Senate Bill 553 (Cortese, 2023), which includes conducting investigations into workplace safety, harassment, and other allegations. As of January 1, 2025, SB 553 allows collective bargaining representatives standing to seek temporary

restraining orders (TRO) in connection with workplace violence. AB 1109 will create a problematic scenario wherein a TRO may be obtained by a union but an employer would be inhibited from investigating the underlying facts. As noted above, AB 1109 lacks guardrails to prevent potential conflicts of interest that could arise during employee safety issues.

For the reasons discussed above, the organizations listed below are respectfully opposed to AB 1109. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Johnnie Piña
Legislative Affairs, Lobbyist
League of California Cities
jpina@calcities.org

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Kinney Hurst
Legislative Representative
Urban Counties of California
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Sarah Dukett
Policy Advocate
Rural County Representatives of California
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Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
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Faith Borges
Legislative Representative
California Association of Joint Powers Authorities
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Sarah Bridge
Association of California Healthcare Districts
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Andrew Martinez
Senior Director of Government Relations
Community College League of California
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Chief Legal Counsel
Public Risk Innovation,
Solutions, and Management (PRISM)

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Legislative Advocate
School Employers Association of California
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Brianna Bruns
Director, Policy & Advocacy
California County Superintendents
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Dane Hutchings
Legislative Representative
California Association of Recreation and
Park Districts
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Lucy Salcido Carter, M.A., J.D.
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Alameda County Office of Education
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Heather Campos
Assistant Superintendent, Human Resources
Dublin Unified School District

Nimarta Grewal
Assistant Superintendent, Human Resources
Pleasanton Unified School District

Leilani Aguinaldo
Legislative Advocate
Schools Excess Liability Fund (SELF)
LeilaniA@sscal.com

Nick Romley
Legislative Advocate
Small School Districts' Association
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Mario Guerrero
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State Governmental Relations
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California Association of School
Business Officials
mgill@casbo.org

CC:

The Honorable Ash Kalra
Members of the Senate Appropriations Committee
Liah Burnley, Consultant, Senate Appropriations Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

July 10, 2025

The Honorable Maria Elena Durazo
Chair, Senate Local Government Committee
State Capitol, Room 407
Sacramento, CA 95814

RE: **AB 1294 (Haney) Planning and Zoning: Housing Development: Standardized Application Form.**
Notice of OPPOSE UNLESS AMEND *(As of 7/3/25)*

Dear Chair Durazo,

The League of California Cities (Cal Cities), the Rural County Representatives of California (RCRC), the Urban Counties of California (UCC) and the California State Association of Counties (CSAC) **must take a position of oppose unless amended** on **AB 1294 (Haney)** which would prohibit a local agency from requiring geotechnical information, stormwater management plans, phase I environmental assessments, mechanical plans, electrical plans, and other information that allow the local agency to determine whether the housing development complies with local objective standards in effect at the time the application is accepted and with the State Subdivision Map Ac.

The Permit Streamlining Act requires each city and county to compile a list, and post it on its website, that specify in detail the information that is required from an application for a housing development project. Within thirty calendar days of receiving an application, a city or county must determine whether the application is complete. An application is complete if it includes all of the items on the list. No new information can be required of the applicant after the application is deemed complete. AB 1294 (Haney) places significant and serious limitations on the items that can be on a city or county's list.

AB 1294 (Haney) directs the Department of Housing and Community Development (HCD) to adopt a standardized application form that all cities and counties would be required to use. Although the form will be used statewide by every single housing developer in every single city and county, the bill exempts HCD from public review and comment when developing it. The development of the form must be subject to the Administrative Procedure Act to ensure public comment, review, clear language, and legal validity.

A standardized housing application might move the application forward. However, the application itself must include sufficient information – such as the information excluded by Government Code Section 65941.2(b)(3) and (4) of the bill to allow a city or county to evaluate the proposed housing project for compliance with objective standards in its

zoning code and with the design and improvement requirements of the Subdivision Map Act.

For the last few years, Cal Cities, RCRC, UCC, and CSAC have persistently pursued solutions to the housing supply and affordability crisis that is gripping many regions of the state. These solutions include streamlining the housing approval process, creating a new state and local financial partnership to fund affordable housing and infrastructure projects, and consolidating important housing program grant applications. Some of these efforts have fallen short and require additional action from the Legislature and Governor.

For these reasons, we must **regretfully must take a position of oppose unless amended AB 1294 (Haney)**. We appreciate the author's willingness to work with stakeholders to address these concerns and look forward to working together to find solutions. If you have any questions, do not hesitate to contact Brady Guertin (Cal Cities) at bguertin@calcities.org, Tracy Rhine (RCRC) at trhine@rcrcnet.org, Chris Lee (UCC) at clee@politicogroup.com or Mark Neuburger (CSAC) at mneuburger@counties.org.

Sincerely,

Brady Guertin
Legislative Advocate

Tracy Rhine
Senior Policy Advocate, RCRC

Mark Neuburger
Legislative Advocate, CSAC

Christopher Lee
Legislative Advocate, UCC

Cc: The Honorable Matt Haney
Members, Senate Local Government Committee

July 8, 2025

The Honorable Thomas Umberg
Chair, Senate Committee on Judiciary
1021 O Street, Room 6740
Sacramento, CA 95814

Re: **AB 1331 (Elhawary): Workplace surveillance**
As amended 6/19/2025 – OPPOSE
To be heard in Senate Committee on Judiciary July 15, 2025

Dear Chair Umberg,

On behalf of the California State Association of Counties (CSAC); Urban Counties of California (UCC); Rural County Representatives of California (RCRC); Public Risk Innovation, Solutions, and Management (PRISM); California Special Districts Association (CSDA); Association of California School Administrators (ACSA); League of California Cities (Cal Cities); California School Boards Association (CSBA); the California Association of Recreation and Park Districts (CARPD); and the California Association of School Business Officials (CASBO) we write in respectful opposition to AB 1331 (Elhawary), which would vastly complicate the routine work of local governments and schools, endanger our ability to perform essential public services, impede our ability to manage and respond to workplace violence threats, and make local governments and schools vulnerable to waste, fraud, and abuse of public resources.

Our coalition insists that this bill is wrongly applied to local governments and should be **amended to fully exempt local agencies and schools**. The bill imposes unnecessary security risks for local agencies, schools, and the public we serve. The right of public employees to organize is well protected from the types of behavior this bill intends to address. Our coalition would remove opposition if local agencies were removed from the bill.

Needlessly endangers public employees and those they serve

Even with the proposed amendments, AB 1331 would needlessly interfere with the ability of local agencies to protect foster children, keep kids safe in schools, and maintain the safety of their workforce or the communities they serve—including election facilities, libraries, and shelters for the unhoused. The unpublished amendments allow for the use of surveillance tools if "required by state and federal law or regulations". While this amendment may allow *some* facilities to continue to use necessary security tools, it is unclear the extent to which this amendment will allow public agencies to protect critical infrastructure and government facilities. Put simply, state and federal laws are rarely prescriptive about the use of security tools – the need for security is implicit. Further, this attempt to exclude certain locations, including airports, from the law's provisions is a clear acknowledgement that AB 1331 creates security gaps for critical facilities.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life and appreciate that one could imagine that appropriate limits are needed to prevent employers from snooping into the private lives of their employees. However, the scope of this bill is vast and would deem basic security tools used for everyday work, including security cameras, collaboration tools like Teams or Slack, or GPS tools used to track fleets, to be "surveillance tools" whose use would be constricted. Under AB 1331, any device that collects or facilitates collection of data of an employee's movements, actions, communications, or behaviors, is deemed a surveillance tool that cannot be used when employees are off duty or in "employee only" areas.

AB 1331 will needlessly endanger public workforces and severely impair our ability to prevent and investigate instances of workplace violence. The bill restricts the ability for public agencies to review data collected through a surveillance tool in any "off-duty area," defined to include breakrooms and cafeterias unless directed by a court order or upon request by either a court, law enforcement, or by an employee. These restrictions needlessly inhibit the use of tools that can be used to keep employees safe from workplace violence incidents or, worse, provide the worst actors with a roadmap of locations where they can more easily hide bad behavior, including abuse of vulnerable populations like children, the elderly, or those experiencing mental health crises.

Under AB 1331, employees must be allowed to leave behind surveillance tools during off-duty hours or when they are entering off-duty areas. It's unclear how these rules would apply to a variety of tools that public employees may be required to use, including emergency alarms for teachers, body cameras for law enforcement, or tools used for public vehicle fleets, including dash cameras, speed monitors, or GPS tracking. Consider election workers, who could be allowed to leave behind tracking tools used to track the delivery and pickup of ballots. The ability for an employee to claim they had simply been "at rest," will give those who are rightfully required to wear surveillance tools an easy out for

any behavior that conflicts with laws or agreements that require wearable tools for public and employee safety.

Unfortunately, we have seen rising hostility and threats against government entities and their workforces. That includes violence and threats of violence against government employees whose job requires them to serve the public, like library staff, teachers, firefighters, benefits officers, among myriad other examples. It also includes public officials who are frequently targeted with threats or actual violence, including election workers, health officers, and public officials. AB 1331 would heighten vulnerability for public servants at a time of strong anti-government sentiment.

Amendments raise new privacy and cost concerns
The ability for employees to request video footage also raises critical privacy concerns about the disclosure of those in the footage, placing public agencies in the difficult position of potentially violating an employee's privacy or incurring considerable costs to blur or pixelate the images of those in the footage.

Significantly expands government liability
To compound all of our concerns, AB 1331 imposes severe financial penalties for non-compliance. For public agencies, these penalties can be staggering and severely impact funds needed to provide essential public services. At a time of significant budget constraints at the state and local level, now is not the time to subject public agencies to nuclear fines for providing basic security measures.

Inappropriately applies to public agencies
We understand the sponsors are advancing this bill to address activities by private employers that use security tools to undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union activities. For example, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Put simply, public agencies use the "surveillance tools" defined in this law to protect public resources, employees, and the public – not to influence employee organization activities. We once again urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1331 and urge your "NO" vote.

Sincerely,

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CC: The Honorable Sade Elhawary, Member, California State Assembly
Members and Consultants, Senate Committee on Judiciary

S E N A T E F L O O R A L E R T

AB 1430 (Bennett): County recorders: fees
As amended 3/17/25 – SUPPORT
Senate Third Reading File

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Counties (CSAC), we write in support of Assembly Bill 1430, a measure that updates and modernizes the statutory fees for county recorders' services. Across the state, county recorders provide important public services and serve as the custodian of vital records, recorded land documents, and other legal documents that support the integrity of property ownership and other legal transactions.

County recorders' offices operate on a fee-for-service basis; however, their fees are limited in statute with maximum amounts that were set in 2009. **The current fee structure disregards cost increases and changes in real estate transactions, resulting in some county recorders requiring additional county general fund resources to maintain operations.**

AB 1430 updates the maximum fee a county recorder may charge for recording the first page of a document from $10 to $15 and additional pages from $3 to $4. These adjustments that are proposed are consistent with relative increases in the Consumer Price Index and still must reflect cost recovery. Further, AB 1430 requires that the fees collected are dedicated to, and solely utilized for, the county recorder's office, and prohibits the fees from exceeding the reasonable costs of the document recording function. While counties generally would prefer flexibility in directing such fees, the county recorders' offices fees are so woefully out of date, we recognize the utility of such a provision.

AB 1430 is an important measure to ensure that services provided by county recorders' offices are not subsidized by the general public through a reasonable update to statutory maximum fees. We respectfully urge your "aye" vote on this important measure.

cc: The Honorable Steve Bennett, California State Assembly

RURAL COUNTY REPRESENTATIVES OF CALIFORNIA

le petit elephant
infant nursery * preschool * jrKindergarten

American Planning Association
California Chapter
Creating Great Communities for All

Anne Cottrell
Napa County Supervisor
District 3

Liz Alessio
Napa County Supervisor
District 2

Children Now®

LEAGUE OF CALIFORNIA CITIES

Child Action, Inc.

BUILD UP CA
EARLY LEARNING FACILITIES

COMMUNITY RESOURCES FOR CHILDREN

FIRST 5 ASSOCIATION OF CALIFORNIA

MADERA COUNTY

FACES
Family & Child Empowerment Services

NCHIIN

URBAN COUNTIES OF CALIFORNIA

UNITE LA
Education Innovation Through Collaboration

August 13, 2025

The Honorable Scott Wiener
Chair, Senate Budget Committee
1021 O Street, Suite 8620
Sacramento, CA 95814

RE: FIX NEEDED – PROTECT ALL DAYCARES FROM CEQA ABUSE

Dear Senator Wiener:

On behalf of the Rural County Representatives of California, Le Petit Elephant, California State Association of Counties, Napa County Supervisor Anne Cottrell, Napa County Supervisor Liz Alessio, Riverside County Supervisor Chuck Washington, American

Planning Association (California Chapter), Children Now, League of California Cities, Low Income Investment Fund, Build Up California, Community Resources for Children, First 5 Association of California, Family & Child Empowerment Services (FACES), Urban Counties of California, the Madera County Board of Supervisors, North Coast Health Improvement and Information Network, Child Action, Inc., and UNITE LA, we write to strongly urge you to revise the recently-enacted Senate Bill 131 to protect all daycares from California Environmental Quality Act (CEQA) misuse.

Senate Bill 131 sought to protect daycares from CEQA abuse, but unfortunately missed the mark and changes are necessary. While we sincerely appreciate the Legislature's attempt to exempt daycares from CEQA, that exemption does not apply to daycares located in residential areas where the overwhelming majority of facilities are *(and should be)* located. Instead, SB 131 merely provides a CEQA exemption for daycare facilities located in commercial, industrial, or agricultural areas. This is an odd fit that will increase traffic, vehicle miles traveled, and environmental exposures to our youngest residents.

CEQA is commendably intended to improve decision-making and mitigate a project's significant impacts on the environment. That being said, it is difficult to imagine that any of CEQA's original supporters could have envisioned it being used against daycare centers. Unfortunately, CEQA has recently been used as a sledgehammer to try and derail a daycare facility in Napa.

Le Petit Elephant Nursery and Preschool (LPE) in was founded in Napa December 2015 with a dream of creating a nurturing, joyful, and inclusive space where children could learn through play, explore the outdoors, and be immersed in the magic of early childhood education. Ten years later, LPE sought to expand into a new facility to accommodate additional children. LPE received the necessary local approvals and was awarded state, local, and federal grants. But then local neighbors filed a lawsuit to block the project, even complaining about the impacts that would be caused by the sounds of children in their neighborhood and youth-based activities at the center. The litigation nearly derailed the project, as the delay cost LPE a pre-approved Small Business Administration Loan that could only be replaced with a high-fee bridge loan. The experience was even highlighted in the *San Francisco Chronicle*.

There is a significant need for additional daycare facilities throughout the state. CEQA cannot be used to undermine the role daycare centers play in the development and enrichment of young children, especially considering the impact daycares have on children, families, and local economies.

For these reasons, and given the demonstrated need to prevent future CEQA abuse, we strongly urge you to extend the new CEQA exemption to daycares in residential areas.

We appreciate your consideration of our request and look forward to further conversations on this issue.

Sincerely,

JOHN KENNEDY
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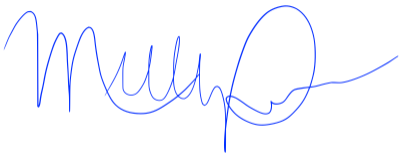

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cc: The Honorable Mike McGuire, Senate President Pro Tempore
The Honorable Robert Rivas, Assembly Speaker

July 28, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

Re: **SB 7 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended July 9, 2025)*

Dear Assembly Member Wicks:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, and Association of California Healthcare Districts, write in respectful opposition to Senate Bill (SB) 7, which would complicate the routine work of local governments, while increasing expenses, without a clear need.

SB 7 May Widely Apply to Many Technologies
We understand the reasonable concerns about the slow creep of new technologies into daily life. However, the scope of this bill is vast and would deem banal tools used for everyday work to be Automated Decision Systems (ADS) whose use could be covered by this bill. Given the bill's broad scope, the burdens from compliance with its notification and appeal requirements are significant.

SB 7 is an Unfunded Mandate on Local Budgets
The initial and ongoing reporting obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. The same is true of the requirements around human review and a mandatory appeals process. Some small agencies may struggle to comply with the bill's requirements concerning review and appeals. The bill's enforcement provisions expose local governments to increased litigation risk and costs. These constitute unfunded mandates on public employers without a clear need. The bill also defines an "employer" subject to its provisions to also include all branches of state government (see Proposed Labor Code Section 1520(e)(1)).

Applying SB 7 to Public Employers May Lead to Unintended Consequences
Local governments are responsible for operating and securing critical infrastructure, jails, hospitals, and police and fire departments. It is not difficult to envision scenarios where the requirements of SB 7 would burden local government operations. For example, as the definitions are sweeping, health care providers using ADS for basic functions such as scheduling, billing, clinical recommendations, protecting patient safety through revealing drug theft or incorrect prescribing, and workplace safety initiatives, would trigger at least some of the bill's requirements related to pre-use notices and employer requirements, with escalating requirements if the system is used to make a discipline, termination, or deactivation decision – a line which may not always be clear. This significant shift will lead to increased costs to public health care providers at a time of funding instability, without a meaningful reason to do so. In addition, counties use ADS in a variety of ways, including for employee training and development and for scheduling. Meeting the requirements of this bill may prove challenging—particularly given the

current timelines, the complexity of overlapping laws, and the potential need for costly system modifications. These challenges could place a significant strain on already limited county budgets. As a result, counties may be forced to temporarily rely on alternative—and potentially less efficient—methods to carry out routine tasks while working toward full compliance.

For public employers with represented workforces, use of technology tools is often bargained between employees and public employers based on local conditions, security needs, and the concerns of the public workforce. State law already prohibits local public employers from using workplace technology tools like ADS to deter or discourage union membership. Specifically, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims. Because of the existing protections already afforded to public employees, we have concerns regarding the likelihood of overlapping or conflicting requirements introduced by this bill that will create uncertainty and liability for local agencies.

Put simply, for public employers, the burdens potentially imposed by this bill exceed any need. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, our organizations must respectfully oppose SB 7. Please feel free to contact us at any time with questions or to further discuss our position.

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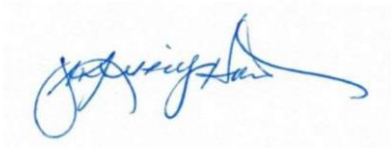

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Healthcare Districts
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CC: The Honorable Jerry McNerney
Members, Assembly Appropriations Committee
Annika Carlson, Principal Consultant, Assembly Appropriations Committee
Lauren Prichard, Consultant, Assembly Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

June 26, 2025

The Honorable Matt Haney, Chair
Assembly Housing and Community Development Committee
1020 N Street, Room 156
Sacramento, CA 95814

RE: SB 16 (Blakespear) – Oppose as Amended June 24, 2025

Dear Assembly Member Haney,

On behalf of the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC) we write in opposition to Senate Bill 16 authored by Senator Catherine Blakespear. While we appreciate efforts to advance future rounds of Homeless Housing, Assistance and Prevention (HHAP) funding, we have renewed concerns with the recently revised approach included in SB 16. Our concerns are centered on the following concepts that will stifle existing county efforts to reduce homelessness and upend collaboration occurring throughout the state with cities, continuums of care (CoCs), and other local partners to address the homelessness crisis.

Prioritizing interim housing – SB 16 continues to prioritize interim housing solutions to the detriment of permanent housing and the services/supports that keep people housed. SB 16 will make it more difficult to provide the needed social, health, and behavioral health services to homeless individuals, as well as make it more challenging to move these individuals into permanent housing. Counties are already facing pressures on behavioral health funding from recent changes to the Behavioral Health Services Act (BHSA) that require counties to redirect significant mental health service resources to address housing needs for homeless individuals with significant mental health and substance use disorder conditions. In addition, SB 16 proposes to expand the use of other fund sources, for purposes outside their current authorization, to pay for interim housing at a time when these resources are already oversubscribed.

Five-year housing expansion without a commitment of state funding – Counties have continually expressed concerns that it is difficult, if not impossible, to strategically plan the expansion of services and housing to eliminate homelessness without a commitment of ongoing resources from the state. SB 16 fails to address that concern. In fact, this measure exacerbates that concern by holding counties accountable for, through the imposition of the builder's remedy, annual benchmarks regarding the expansion of homeless habitation capacity with no commitment of state support. Additionally, SB 16 is another example of the continual restructuring of HHAP planning, application processes, and expenditure

priorities that impede progress and "move the goalposts." At the same time, local agencies are consistently scapegoated for inconsistent outcomes that result from uncertain annual funding.

County MOU obligation unclear – As currently drafted, we also are concerned with the obligation on counties to provide for "base operations" of housing for unsheltered populations, including all health and social safety net programs. For example, Medi-Cal managed care plans play a role in the delivery of behavioral health, and non-specialty mental health services. Counties have the obligation to provide specialty mental health and substance use disorder services to eligible and enrolled beneficiaries for whom services are medically necessary. Medi-Cal managed care plans (MCPs) contracted through the Department of Health Care Services are currently responsible for the Medi-Cal entitlements for physical health, long-term care, and non-specialty mental health services. In addition, MCPs supplement county behavioral health services with Enhanced Care Management and Community Supports through CalAIM. SB 16 would require counties to assume fiscal responsibility for the entirety of health and social services for unhoused individuals in homeless housing, including those benefits that are currently the health plans' responsibility. Furthermore, with significant uncertainty looming related to federal funding for Medi-Cal and other social services, counties should not be obligated to assume responsibility for programs that may be cut moving forward.

Any obligation to provide services in homeless housing should be limited to existing benefits and funding levels. It is also unclear whether counties would be obligated to provide these services in the unincorporated area of a county, or countywide without a commitment of state funding or limiting service provisions to available resources.

Other efforts to structure/authorize HHAP round 7 – As of writing this letter, it remains unclear how SB 16 will interact with other legislative efforts to structure round 7 of the HHAP program. According to the Senate Budget and Fiscal Review Committee's Summary of the Budget Act of 2025, and legislative testimony, SB/AB 131 are expected to authorize $500 million in 2026-27 for round 7 of the program and include additional accountability measures. If SB 16 outlines the planning and application processes and new accountability measures for the same round of funding, we are unclear how the two measures will interact and what exactly will be required of counties to access future funding.

Encampment resolution model ordinance – Lastly, SB 16 conditions future HHAP funding on a county enacting an encampment resolution ordinance substantially the same as a model ordinance previously released by the Governor. County boards of supervisors are duly elected to enact policies that address local concerns. This ordinance may not fit each county's unique circumstances and should not impede access to state assistance that is necessary to assist the most vulnerable Californians.

Counties remain willing partners in finding solutions to improve the state's homelessness response system. However, this legislation fails to advance such solutions and, as a result, we must oppose SB 16.

Josh Gauger
Legislative Advocate
UCC

Tracy Rhine
Senior Policy Advocate
RCRC

cc: The Honorable Catherine Blakespear, California State Senate
Members and Consultants, Assembly Housing and Community Development Committee

CMUA
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION
CSAC
WESTERN WATER
CalChamber
CALIFORNIA CHAMBER OF COMMERCE
SWCLC Southwest California Legislative Council
CBIA California Building Industry Association
FB California Farm Bureau
LEAGUE OF CALIFORNIA CITIES
URBAN COUNTIES OF CALIFORNIA
NFIB
California Special Districts Association
CSDA
Districts Stronger Together
CASA
CMTA
CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION
RebuildSoCal Partnership
CITY OF CORONA
EST. 1896
MURRIETA/WILDOMAR
CHAMBER OF COMMERCE
ACWA
Association of California Water Agencies
CWA
CALIFORNIA WATER ASSOCIATION
CITY OF SAN BERNARDINO WATER DEPT.
VALLEY CENTER MUNICIPAL WATER DISTRICT
Water Conservation / A Way of Life
ROWLAND WATER DISTRICT
metro
SACRAMENTO METROPOLITAN CHAMBER OF COMMERCE
MAYOR PATRICIA LOCK DAWSON
CITY OF RIVERSIDE
TRABUCO CANYON WATER DISTRICT
ELSINORE VALLEY MUNICIPAL WATER DISTRICT
COUNTY OF RIVERSIDE
MAY 9, 1893
STOCKTON EAST WATER DISTRICT
TEMESCAL VALLEY WATER DISTRICT
WESTERN GROWERS
Fresh produce from our families to yours
SCV WATER
NCWA
Northern California Water Association
BAYAREA COUNCIL
CALIFORNIA GRAIN & FEED ASSOCIATION
CALIFORNIA ASSOCIATION OF WHEAT GROWERS
GROWER-SHIPPER ASSOCIATION of Central California
RUBIO CAÑON Land and Water ASSOCIATION
NORTH BAY LEADERSHIP COUNCIL
Association of Califor Egg Farmers
WALNUT VALLEY WATER DISTRICT
Friant WATER AUTHORITY
OLIVE GROWERS COUNCIL OF CALIFORNIA
unitedag
EID El Dorado Irrigation District
CWA
CALIFORNIA WOMEN for AGRICULTURE
CALIFORNIA APPLE COMMISSION
CALIFORNIA COTTON GINNERS AND GROWERS ASSOCIATION
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Serving the Dairy Industry Since 1949
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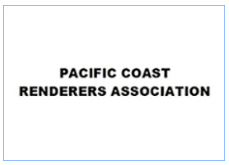
California Alfalfa & Forage Association
wph Western Plant Health
HealthyPlants.org
CALIFORNIA STATE FLORAL ASSOCIATION
PACIFIC EGG & POULTRY ASSN
Industry's Voice of the West
WAPA
WESTERN AGRICULTURAL PROCESSORS ASSOCIATION
California Blueberry Association
CALIFORNIA Blueberry COMMISSION
CALIFORNIA BEAN SHIPPERS ASSOCIATION
CALIFORNIA WAREHOUSE ASSOCIATION
California WALNUTS
WATER DISTRICT
Cucamonga Valley® Water District
Service Beyond Expectation
California Seed Association
MesaWater DISTRICT®
California Pear Growers Association
OLIVENHAIN Municipal Water District
A Public Agency
CONNECT FOLSOM CHAMBER
CALLEGUAS MUNICIPAL WATER DISTRICT
emwd EASTERN MUNICIPAL WATER DISTRICT

Irvine Ranch
Water District

SSJID
SOUTH SAN JOAQUIN
IRRIGATION DISTRICT

California
Association
of Winegrape
Growers


PACIFIC COAST
RENDERERS ASSOCIATION

McMullin Area
Groundwater Sustainability Agency

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WEST BASIN
MUNICIPAL WATER DISTRICT

EAST BAY
LEADERSHIP
COUNCIL

Rancho
Water
WORKING FOR OUR COMMUNITY

3V
THREE VALLEYS
MUNICIPAL WATER DISTRICT

SAN BERNARDINO VALLEY
A REGIONAL WATER AGENCY
SINCE 1954

SAN JUAN WATER
SINCE 1854

Valley Ag Water Coalition

California
CITRUS
MUTUAL

KRCD
Kings River Conservation District

LAS VIRGENES
MUNICIPAL
WATER DISTRICT
EST. 1958

Bellflower-Somerset
mutual water company

CalDesal

Solano County
Water Agency

Santa Margarita
Water District

Dublin
CHAMBER OF COMMERCE

SCWC

Mammoth Lakes
CALIFORNIA

STATE WATER CONTRACTORS
SWC

Valley Water

BREA
CHAMBER
CATALYST. CONVENER. CHAMPION.

Agricultural Council
of California

MWDOC

PVID
EST. 1918

Monte Vista
Water District

KRWA
KINGS RIVER WATER ASSOCIATION

VALLEY COUNTY
WATER DISTRICT

Biz
Fed
Los Angeles
County
Business
Federation
Strengthening the Voice of Business

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RUBIDOUX
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ASSOCIATION
OF REALTORS

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CALIFORNIA

BUILDING INDUSTRY ASSOCIATION
OF SOUTHERN CALIFORNIA
BIA

bvn
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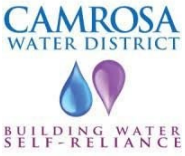
CAMROSA
WATER DISTRICT
BUILDING WATER
SELF-RELIANCE

West Valley
Water District

CALIFORNIA
BUSINESS
ROUNDTABLE

CALIFORNIA HISPANIC CHAMBERS OF COMMERCE
EST. 1978

CITY OF
BURBANK
WATER AND
POWER

CITY OF
LAKE ELSINORE
DREAM EXTREME

CITY OF JURUPA VALLEY
A COMMUNITY OF COMMUNITIES

CITY OF CANYON LAKE
CANYON LAKE
INCORPORATED DECEMBER 1, 1990

CALIFORNIA FARM
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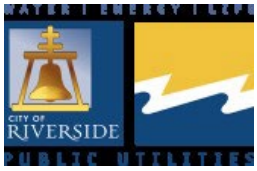
INDUSTRIAL
ENVIRONMENTAL
ASSOCIATION
Promoting Industry and
Protecting the Environment

CITRUS HEIGHTS
CHAMBER
CONNECTING ■ BUSINESS ■ EDUCATION ■ COMMUNITY

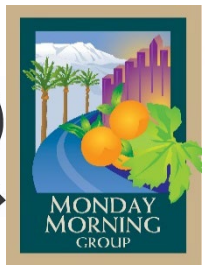
CITY OF ONTARIO
CALIF.
BALANCED COMMUNITY

MURRIETA
SOUTHERN CALIFORNIA
CONNECTED BY COMMUNITY

GREATER RIVERSIDE
CHAMBERS OF COMMERCE


CITY OF
RIVERSIDE
PUBLIC UTILITIES

HDR


MONDAY
MORNING
GROUP

SBA
CC
San Bernardino Area
Chamber of Commerce

ECONOMIC DEVELOPMENT
COALITION
Valley of Innovation

July 11, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 72 (Caballero) The California Water Plan: long term supply targets **– SUPPORT**

Dear Chair Wicks,

The California Municipal Utilities Association (CMUA), California State Association of Counties (CSAC), and California Council for Environmental and Economic Balance (CCEEB) are very proud co-sponsors of SB 72 (Caballero). We, along with the coalition of organizations above, are pleased to support SB 72.

California is in a race against climate change, which is pressured by multi-year droughts, floods, fires, and other intensifying climate change impacts. Consequently, there is an urgent need for California to develop aspirational targets that will complement and amplify Governor Newsom's Water Supply Strategy and extend beyond any single Administration. Given the extreme climate impacts of the 21st century, an expanding economy, a growing population, the anticipated reductions from existing water resources, and the controls on the use of groundwater, California needs to align the state's water supply strategy and policies with a target that will result in an adequate and reliable water supply for all beneficial uses including the environment, agriculture, the economy, and all Californians. Recent research estimates a shortfall in California's future water supply between 4.6 and 9 million acre-feet annually by 2050 if the state takes no action.

SB 72 is the mechanism that will help California keep up with the impacts of climate change on our water supply. SB 72 directs the Department of Water Resources (DWR) to modernize the California Water Plan and develop a target for water supply to achieve in 2040 and beyond. The fiscal impacts of this bill are minor compared to the agricultural and business loss costs of the State for not passing this legislation. A new UC study titled "Inaction's Economic Cost for California's Water Supply Challenges" (released May 2025) estimates that without better management, California faces up to $14.5 billion a year in economic loss and 67,000 jobs lost annually. Inaction isn't just an environmental risk – it threatens California's job market and economic wellbeing.

SB 72 will establish excellent policy because it will bring about the fundamental changes that are necessary to ensure a sustainable water future. SB 72 will do the following:

- Transform water management in California taking us from a perpetual state of supply vulnerability to a reliable and sufficient water supply that is adequate for all beneficial uses, including urban, agriculture, and the environment.
- Create a new "North Star" water supply planning target for 2040 that the state will need to work toward, along with a process to develop a target for 2050.
- Preserve the California way of life, supplying water to our homes and communities, habitat and environment, recreation and tourism, and business and economic success.
- Support economic vitality for all businesses, from restaurants to technology companies, and employers that depend on a reliable water supply.
- Fulfill the generational responsibility to develop a water system that will adapt to changes in the environment and allow the state to thrive now and for future generations.

The California Water Plan is the strategic plan for managing and developing water resources for current and future generations in the state. SB 72 works within the structure of the current California Water Plan, which hasn't been meaningfully updated for decades. SB 72 updates the California Water Plan for a 21st century climate. The costs to implement SB 72 should not be a barrier to passing a monumentally important piece of legislation for the future of California.

For these reasons, we urge your support for SB 72. If you have any questions about our position, please contact Andrea Abergel with CMUA at aabergel@cmua.org or (916) 841-4060.

Sincerely,

Andrea Abergel
Director of Water
California Municipal Utilities Association

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President/CEO
CCEEB

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Senior VP, Public Policy
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Executive Director
California Association of Wheat Growers

Natalie Collins
President
California Association of Winegrape Growers

Jane Townsend
Executive Director
California Bean Shippers Association

Todd Sanders
Executive Director
California Blueberry Association

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President and CEO
California Building Industry Association

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Policy Advocate
California Chamber of Commerce

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Senior Policy Advocate
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President/CEO
California Grain and Feed Association

Lance Hastings
President & CEO
California Manufacturers & Technology Assoc.

Chris Zanobini
Executive Director
California Pear Growers Association

Chris Zanobini
Executive Vice-President
California Seed Association

Ann Quinn
Executive Vice President
California State Floral Association

Robert Verloop
Executive Director/CEO
California Walnuts

Ann Quinn
Executive Vice President
California Warehouse Association

Sharron Zoller
President
California Women for Agriculture

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General Manager
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Mayor
City of Riverside

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County of Riverside

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General Manager
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President & CEO
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Eastern Municipal Water District

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General Manager
El Dorado Irrigation District

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General Manager
Elsinore Valley Municipal Water District

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Chief Executive Officer
Folsom Chamber of Commerce

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CEO
Friant Water Authority

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President
Grower-Shipper Association

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General Manager
Las Virgenes Municipal Water District

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General Manager
McMullin Area GSA

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Manager
Milk Producers Council

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General Manager
Monte Vista Water District

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National Federation of Independent Business

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Northern California Water Association

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Executive Director
Olive Growers Council of California

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Executive Officer
Pacific Coast Renderers Association

Debbie Murdock
Executive Director
Pacific Egg and Poultry Association

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General Manager
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Interim General Manager
Rancho California Water District

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Executive Director
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President & CEO
Sac Metropolitan Chamber of Commerce

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General Manager
San Bernardino Valley Municipal Water District

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General Manager
San Juan Water District

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General Manager
Santa Clarita Valley Water Agency

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General Manager
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Southwest California Legislative Council

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Matthew Litchfield
General Manager
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General Manager
Trabuco Canyon Water District

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Turlock Irrigation District

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General Manager
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President & CEO
Western Growers

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Western Plant Health

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General Manager
Western Municipal Water District

Norman Huff
General Manager
Camrosa Water District

Chris Berch
General Manager
Jurupa Community Services District

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General Manager
Rubidoux Community Services District

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General Manager
San Gabriel County Water District

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General Manager
Santa Ana Watershed Project Authority

Jose Martinez
General Manager
Valley County Water District

John Thiel
General Manager
West Valley Water District

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BizFed Los Angeles County

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Director of Communications
Black Voice News

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CEO
Building Industry Assoc. of Southern CA

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General Manager
Burbank Water and Power

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President
California Association of Realtors

Robert C. Lapsley
President
California Business Roundtable

Greg Johnson
President
California Farm Water Coalition

Julian Canete
President and CEO
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California Water Association

Sheri Merrick
Executive Director
Citrus Heights Chamber of Commerce

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Council Member
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Mayor
City of Hemet

Natasha Johnson
Council Member
City of Lake Elsinore

Chris Barajas
Council Member
City of Jurupa Valley

Dr. Lisa DeForest
Mayor Pro Tem
City of Murrieta

Paul Leon
Mayor
City of Ontario

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Interim General Manager
City of Riverside Public Utilities

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Economic Development Coalition

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Governmental Affairs Manager
Greater Riverside Chambers of Commerce

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Chairman of Board of Directors
HDR Engineering

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Monday Morning Group of Riverside

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President & CEO
San Bernardino Area Chamber of Commerce

Luis Portillo
President & CEO
San Gabriel Valley Economic Partnership

Aziz Amiri
CEO
San Gabriel Valley Regional Chamber of Commerce

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SRCAR

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General Manager
Desert Water Agency

Jared Macias
Administrative Office
Puente Basin Water Agency

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Legislative Affairs Lobbyist
League of California Cities

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Watermaster
Kings River Water Association

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General Manager
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Jennifer Pierre
General Manager
State Water Contractors

Mauricio Guardado
General Manager
United Water Conservation District

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General Manager
Santa Margarita Water District

Harvey De La Torre
General Manager
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Executive Director
Southern California Water Coalition

Glenn Farrel
Executive Director
CalDesal

Casey Creamer
President
California Citrus Mutual

Tricia Geringer
Vice President of Government Affairs
Agricultural Council of California

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Executive Director
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President/CEO
Brea Chamber of Commerce

Gina Molinaro-Cardera
Board Supervisor
Dublin Chamber of Commerce

Lance Eckhart
General Manager
San Gorgonio Pass Water Agency

Jim Piefer
Executive Director
Regional Water Authority

Federico Barajas
Executive Director
San Luis & Delta Mendota Water Authority

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Board President
Contra Costa Water District

Caroline Schirato
Board Chair
Utica Water and Power Authority

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Lobbyist for
California Fire Chiefs Association

Julee Malinowski-Ball
Lobbyist for
Fire Districts Association of California

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Mountain Counties Water Resources Assoc

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Managing Director
WateReuse California

Randy Schoellerman
President
California Groundwater Coalition

Neil McCormick
CEO
California Special Districts Association

Krista Bernasconi
Mayor
City of Roseville

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Managing Director
Community Water Systems Alliance

Sue Mosburg
Executive Director
CA-NV AWWA

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State Government Affairs Manager
Associated Equipment Distributors

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General Manager
Metropolitan Water District of Southern California

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General Manager
Inland Empire Utilities Agency

Jessica Gauger
Director of Legislative Advocacy & Public Affairs
California Association of Sanitation Agencies

Craig Kessler
Executive Director
California Alliance for Golf

Carlos Quintero
General Manager
Sweetwater Authority

Caity Maple
Councilmember – District 5
City of Sacramento

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Executive Director
Water Blueprint for the San Joaquin Valley Advocacy Fund

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General Manager
Western Canal Water District

Jeff Payne
Assistant General Manager
Westlands Water District

Eric Will
Policy Advocate
Rural County Representatives of California

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General Manager
Tehama-Colusa Canal Authority

Mauricio Guardado
General Manager
United Water ConservationDistrict

June 16, 2025

The Honorable Liz Ortega
Chair, Assembly Labor and Employment Committee
1020 N Street, Room 155
Sacramento, CA 95814

Re: **SB 238 (Smallwood-Cuevas) Workplace surveillance tools.**
OPPOSE *(As Amended May 1, 2025)*

Dear Assembly Member Ortega:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, League of California Cities, Association of California School Administrators, and the California Association of Joint Powers Authorities, write in respectful opposition to Senate Bill (SB) 238, which would complicate the routine work of local governments and schools, impede our ability to manage and respond to workplace violence and other threats, and make local governments vulnerable to waste, fraud, and abuse of public resources.

SB 238 Would Widely Apply to Many Technologies
We understand the reasonable concerns about the slow creep of surveillance tools into every aspect of daily life. However, the scope of this bill is vast and would deem banal tools used for everyday work, including badge access, collaboration tools like Teams or Slack, or GPS tools used to track fleets, to be "surveillance tools" whose use could be covered by this bill. Under SB 238, any device that collects or facilitates collection of data of an employee's activities, actions, communications, behaviors, personal information, or biometrics, or those of the public, is deemed a surveillance tool. Given the bill's broad scope, the burdens from compliance with its notification requirements are significant.

SB 238 Would Jeopardize Local Government and Schools Security Efforts
SB 238 would require reporting to the Department of Industrial Relations (DIR), and for the DIR to thereafter publicize, sensitive data on which tools public employers use, their capabilities, and the names of individuals and vendors that run the systems or receive data. Disclosure of this information could provide a material advantage to bad actors seeking to exploit vulnerabilities or gaps in coverage.

Due to the unique aspects of public sector service delivery, public employers may use a variety of surveillance tools to protect employees, students, or the public at large, including emergency alarms for teachers, body cameras for law enforcement, or tools used for public vehicle fleets, including dash cameras, speed monitors, or GPS tracking. Local governments are responsible for securing and operating critical infrastructure, jails, hospitals, police and fire departments, and protecting students in schools.

Further, we have seen rising hostility and threats against government entities and their workforces. That includes violence and threats of violence against government employees whose job requires them to serve the public like library staff, teachers, firefighters, benefits officers, among myriad other examples.

Reporting and publication of the detailed information required by SB 238 could set back public employers' efforts to protect employees and the public.

SB 238 is an Unfunded Mandate on Local Budgets
The initial and ongoing reporting obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. This constitutes an unfunded mandate on public employers without a clear need. For schools, this is a drain of Proposition 98 funding.

Applying SB 238 to Public Employers May Lead to Unintended Consequences
Apart from our general concerns with the measure, there are several provisions of SB 238 which make it particularly ill-suited to the public sector. First, the bill makes several references to "consumers" and appears to be, in part, a consumer protection measure. These references range from the definition of "personal information" to the requirement that the notice required to be provided by a public employer to DIR include information on whether the workplace surveillance tool will impact consumers and whether they are notified, what information will be collected, who can access it, and whether consumer can "opt out." However, local governments and schools are not businesses, operate to provide a public service not for profit, and do not have consumers.

Similarly, the bill's definition of workplace surveillance tool applies the bill's requirements to tools that not only collect data about employees, but also those that collect data from the public. Again, this will lead to unintended results when applied to the public sector, which utilizes important surveillance tools in routine operations such as securing critical infrastructure against threats, securing schools against threats, dash cameras, body-worn cameras, and traffic enforcement tools, jail security, and hospital security, to name just a few.

For public employers with represented workforces, workplace surveillance is often bargained between employees and public employers based on local conditions, security needs, and the concerns of the public workforce. State law already prohibits public employers from using workplace surveillance tools to deter or discourage union membership. Specifically, Government Code § 3550 provides that a public employer shall not deter or discourage public employees, or applicants to be public employees, from becoming or remaining members of an employee organization. Section 3551.5 imposes significant penalties for violations of § 3550 and grants employee organizations standing to bring the claims.

Put simply, public employers use surveillance tools to protect public resources, employees, students, and the public at large, not to operate a business. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, our organization must respectfully oppose SB 238. Please feel free to contact us at any time with questions or to further discuss how this measure would affect our members and the communities they serve.

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
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California State Association of Counties
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Legislative Advocate
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Faith Borges
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California Association of Joint Powers Authorities
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CC: The Honorable Lola Smallwood-Cuevas
Members, Assembly Labor and Employment Committee
Megan Lane, Chief Consultant, Assembly Labor and Employment Committee
Lauren Prichard, Consultant, Assembly Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom

June 17, 2025

The Honorable Ash Kalra
Chair, Assembly Judiciary Committee
1020 N St, Room 104
Sacramento, CA 95814

RE: Senate Bill 303 (Smallwood-Cuevas) – SUPPORT
As Amended May 1, 2025

Dear Chair Kalra,

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Urban Counties of California (UCC), we are pleased to support Senate Bill 303 (Smallwood-Cuevas), which protects the confidentiality of personal reflections shared during bias mitigation training. This bill ensures that if a public employee shares or acknowledges personal bias as part of required training, that information cannot be used against them in civil or administrative legal actions.

SB 303 encourages open and honest participation in training by making sure employees can reflect without fear of legal consequences. At the same time, the bill still allows evidence of actual misconduct—like discrimination or harassment—to be used when necessary.

For these reasons, RCRC, CSAC and UCC respectfully request your "Aye" vote when this bill is heard before your committee. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org

Eric Lawyer
Legislative Advocate
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elawyer@counties.org

Jean Kinney Hurst
Legislative Advocate
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cc: The Honorable Lola Smallwood-Cuevas, Member of the California State Senate
Members of the Assembly Judiciary Committee
Alison Merrilees, Chief Counsel, Assembly Judiciary Committee
Daryl Thomas, Consultant, Assembly Republican Caucus

July 2, 2025

The Honorable Mia Bonta
Chair, Assembly Health Committee
1020 N Street, Room 390
Sacramento, CA 95814

Re: SB 331 (Menjivar): Substance Abuse
As Amended May 23, 2025 – OPPOSE
Set for Hearing July 8, 2025 in Assembly Health Committee

Dear Chair Bonta,

On behalf of the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write in respectful opposition to Senate Bill 331 by Senator Menjivar.

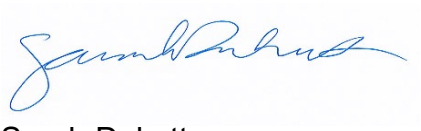
We are specifically concerned with the provision that defines "mental health disorder" as *any* condition outlined in the Diagnostic and Statistical Manual of Mental Disorders (DSM) for the purposes of administering the Lanterman-Petris-Short (LPS) Act. The DSM is developed by clinicians to provide guidelines on a wide range of mental health, substance use disorder, neurocognitive, and neurodevelopmental conditions, and is periodically updated to reflect how our understanding of these conditions evolves over time. For example, the DSM incorporates everything from how to diagnose restless legs syndrome and autism, to caffeine use disorder, and schizophrenia. While the DSM does include mental health and substance use disorder conditions for the purposes of diagnosis, LPS was not intended to be applied to the full range of conditions cited in the DSM, when it was first passed in 1965, or today. Probate conservatorships exist under an entirely separate body of law for individuals with neurocognitive and neurodevelopmental conditions that prevent them from being able to care for themselves.

Currently, counties interpret "mental health disorder" to align with 60 years' worth of implementation of the Act which historically and today means those mental health conditions that are treatable through county behavioral health safety net services. Counties do not consider it necessary or appropriate to expand the definition to be inclusive of all the possible diagnoses that may at any point emerge in the DSM. We are also concerned that any attempt to further define "mental health disorder" in statute will potentially have unintended consequences, which either greatly expand or restrict our authority and may lead to additional legal challenges, and ultimately hamstring counties'

ability to apply LPS in the ways that were intended, for the safety and wellbeing of individuals and communities alike.

For these reasons, UCC and RCRC are opposed to SB 331 and ask for your "no" vote when it is heard in your committee. Please do not hesitate to reach out with any questions.

Sincerely,



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cc: The Honorable Carolyn Menjivar, Member, California State Senate
Members of the Assembly Health Committee
Logan Hess, Principal Consultant, Assembly Health Committee
Justin Boman, Consultant, Assembly Republican Caucus

ASSEMBLY FLOOR ALERT

SB 346 (Durazo): Local agencies: transient occupancy taxes: short-term rental facilitator
As amended 7/07/25 - SUPPORT
Assembly Third Reading File

On behalf of the Urban Counties of California (UCC), the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC), we write in support of Senate Bill 346, Senator Durazo's measure that will **strengthen local tools to ensure compliance with local ordinances regarding the collection and remittance of transient occupancy taxes (TOT) applicable to short-term rentals.**

Regrettably, the application of local TOT ordinances and collection and remittance of taxes is inconsistent and often simply avoided, even when voluntary collection agreements are entered into. Because local agencies do not have access to the address or any other personally identifiable information for listed properties, even under voluntary collection agreements, cities and counties are in the untenable position of choosing between collecting some taxes without this critical information and trusting that it is accurately collected, or trying to pursue collection directly from property owners, which is a time- and cost-intensive process that may or may not result in a fair application of local laws.

SB 346 promises to increase TOT compliance and ensure that local agencies are appropriately collecting tax revenue from those that are lawfully licensed short-term rental properties by authorizing a local agency to require the short-term rental facilitator to report the physical address of the short-term rental property and, if that information is insufficient for the local agency, additional identifying information. Further, such authority will assist local agencies in ensuring that TOT obligations are consistent among other short-term stay facilities, like hotels, motels, and bed and breakfasts, and that those that profit from short-term rental properties are no longer able to obfuscate their location and therefore their tax obligations.

SB 346 is a much-needed effort to modernize California statute and provide local agencies the tools needed to fairly and effectively apply existing laws to evolving technologies. We respectfully urge your aye vote on SB 346.

cc: The Honorable Maria Elena Durazo, California State Senate
Ben Triffo, League of California Cities
Karen Lange, California Association of County Treasurers and Tax Collectors

July 14, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 413 (Allen) Juveniles: case file inspection. As amended June 25, 2025.
To be heard in Assembly Appropriations Committee on July 16, 2025

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC), we write to express our strong support of SB 413 (Allen), which makes important clarifying amendments to Welfare and Institutions Code section 827. First, this bill clarifies that a county counsel or city attorney representing the child welfare agency or probation department is entitled to inspect a juvenile file in connection with the administration or review of child welfare or probation services as specified. Second, this bill ensures that attorneys representing parties in a government tort claim or civil action, where a local agency, child welfare agency, or probation department, or their employees acting in their official capacity, are named, are entitled parties for the purpose of accessing juvenile records.

These two amendments will provide significant benefits. The benefits include:

- Saving money, for the youth and former youth who are suing counties, for the courts, and for the counties;
- Expediting civil claims against counties, thus hastening resolution for the youth/former youth plaintiffs;
- Encouraging consistencies among counties and courts; and,
- Ensuring that juvenile records are handled with care and confidentiality.

This proposal represents a tremendous step in ensuring plaintiffs who are filing claims against a county, the child welfare department, and/or the probation department obtain timely resolution of their claims. In addition to saving time, this proposal will reduce litigation costs by eliminating the otherwise necessary, time-consuming, and costly WIC §827 petition process. And, significantly, it protects the confidentiality rights of minors by including very specific requirements for the care, handling, and ultimate destruction of the juvenile records.

SB 413 strikes the appropriate balance between the Code's presumption that juvenile files are unavailable to the public except under specified circumstances, and the need for county counsel and attorneys representing counties to access the files when counties are sued for damages by current or former wards and dependents.

For these reasons, CSAC is proud to support SB 413 (Allen). Should you have any questions regarding our position, please do not hesitate to contact Eric Lawyer (elawyer@counties.org), Jean Hurst (jkh@hbeadvocacy.com), or Sarah Dukett (sdukett@rcrcnet.org).

Sincerely,

Eric Lawyer Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Hurst Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

Sarah Dukett Policy Advocate Rural
County Representatives of California
sdukett@rcrcnet.org

CC: The Honorable Ben Allen, California State Senate
Members and Staff, Assembly Appropriations Committee
Jay Dickenson, Chief Consultant, Assembly Appropriations Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

July 2, 2025

The Honorable Lori Wilson
Chair, Assembly Transportation Committee
1021 O Street, Suite #8110
Sacramento, CA 95814

RE: **SB 445 (Wiener) Transportation: planning: Sustainable Transportation Project Delivery Reform Act**
OPPOSITION *(As Amended on 6/30/25)*

Dear Chair Wilson,

The local government associations listed above must express our shared **opposition** to SB 445 (Wiener), as amended on June 30, 2025. As representatives of local publicly owned utilities and public agencies writ-large (local agencies), we recognize the importance of critical transportation infrastructure, especially as the state seeks to decarbonize as quickly as possible to combat climate change. However, we have significant concerns with the new amendments to this bill, which would have major implications for public safety, costs, and the reliable provision of electric, water, and sewer service.

As amended, SB 445 would make a number of significant and sweeping changes to how local agencies interact with external entities, such as transit districts and the California State Transportation Agency (CalSTA), leading to the near-total erosion of local authority to manage public infrastructure/assets. It is unclear to us as public agencies why this bill elevates sustainable transit projects above all other public infrastructure, such as water, wastewater, and power infrastructure.

There are numerous reasons why allowing external entities and the state to override our say on public infrastructure would have significant adverse effects on local utility customers and taxpayers. However, most importantly, if this timeline cannot be met, the amended version of SB 445 gives a project proponent the ability to move forward with a project altering or moving critical infrastructure regardless of worker safety and the broader impacts to the communities we serve.

Electric, water, and sewer infrastructure may serve thousands or even millions of people in a community or region. Altering that infrastructure, moving it, or impeding access to it as contemplated by the SB 445 could disrupt service at a regional scale and, more importantly, pose significant safety risks for the community. It is impossible to find a “one-size-fits-all” approach to project design, planning and build that could apply to any utility infrastructure regardless of size without entailing the risks discussed above.

We, as public agencies and the members we represent, appreciate the author's intent of this bill and many also support the development of sustainable transit projects, However, given the significant implications of making this policy wrong, **we respectfully oppose SB 445 and request that it become a**

two-year bill. Doing so would afford us much-needed time to meet with the author and discuss how specific concerns could be addressed without threatening public safety and the provision of essential utility service.

If you have any questions, do not hesitate to contact CMUA at (916) 827-7113 or ddolfie@cmua.org.

Sincerely,

Derek Dolfie
Director of Energy
California Municipal Utilities Association

Anthony J. Tannehill
Legislative Representative
California Special Districts Association

Damon Conklin
Legislative Advocate
League of California Cities

Jessica Gauger
Director of Legislative Advocacy & Public Affairs
California Association of Sanitation Agencies

Eric Will
Policy Advocate
Rural County Representatives of California

Kylie Wright
Policy Advocate
Association of California Water Agencies

Mark Neuburger
Legislative Advocate
California State Association of Counties

Brenley McKenna
Managing Director
WateReuse California

Christopher Lee
Legislative Advocate
Urban Counties of California

cc: The Honorable Scott Wiener
Members, Assembly Transportation Committee
Farra Bracht, Chief Consultant, Assembly Transportation Committee
Daniel Ballon, Consultant, Assembly Republican Caucus

June 18, 2025

The Honorable Liz Ortega
Chair, Assembly Labor and Employment Committee
1020 N Street, Room 155
Sacramento, CA 95814

Re: **SB 464 (Smallwood-Cuevas) Employer pay data**
As amended May 1, 2025 – OPPOSE UNLESS AMENDED
To be heard in the Assembly Labor and Employment Committee on June 25, 2025

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), League of California Cities (Cal Cities), California Special Districts Association (CSDA), Urban Counties of California (UCC) and Rural County Representatives of California (RCRC), we respectfully oppose SB 464 (Smallwood-Cuevas), unless amended.

According to the author, the amendments to Section 2 published on May 1 were intended to "limit the scope of the bill to state workers." We understand these amendments were made to respond to the concerns of our coalition. However, the current bill language could require a portion of counties, and a portion of their workforce, to conduct the annual pay data report. This means the bill would impose a new reporting requirement on 25 of the state's smallest, most rural counties; most of which lack the resources of the larger counties that would be excluded from the bill's requirements.

The May 1 amendments narrow the definition of a "public employer," to "...the employer of an employee in the state 'civil service,' as that phrase is defined in Article VII of the Constitution." While Article VII does not, in fact, define "civil service," the term is often used to refer to not only the state workforce, but also segments of the local workforce whose positions are funded in part by the federal government for social services and child welfare programs, a system known as the Merit System Services Program (MSS). Those positions are subject to State personnel standards administered by CalHR[1] and 25 counties are required to have their MSS program administered by CalHR. The language in SB 464 is unclear as to

[1] Government Code §§ 19800-19811

whether or not the bill applies to MSS employees and could be interpreted to require reporting by counties for those employees.

We believe this is an unfair treatment for rural counties and is not aligned with the intent of the author. Further, if counties are required to submit the report for MSS employees, it could muddy the data, as pay data for state employees will be mixed with data from a few segments of the county workforces among just under half of California's counties.

To address these concerns, we have asked the author to accept the following amendments to Section 12999.1(c):

> (1) "Employee" means a person employed in the "state civil service" as that phrase is defined in Article VII of the Constitution. *For the purposes of this section, "public employer" does not include a "local agency," as defined in Government Code Section 3511.1(c).*
>
> (2) "Public employer" means the employer of an employee in the state "civil service," as the phrase is defined in Article VII of the Constitution. *For the purposes of this section, "public employer" does not include a "local agency," as defined in Government Code Section 3511.1(c).*

With the amendments we have provided, the bill would meet its intended purpose, avoid data challenges, and would no longer be a reimbursable state mandated program. However, we must remain respectfully opposed to the bill unless it is amended to apply solely to state agencies and their workforce.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Johnnie Pina
Legislative Advocate
League of California Cities
jpina@calcities.org

Aaron Avery

Sarah Dukett
Policy Advocate

Director of State Legislative Affairs
California Special Districts Association
aarona@csda.net

Rural County Representatives of California
sdukett@rcrcnet.org

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
jkh@hbeadvocacy.com

CC: The Honorable Lola Smallwood-Cuevas, California State Senate
Members and Consultants, Assembly Labor and Employment Committee
Megan Lane, Chief Consultant, Assembly Labor and Employment Committee
Lauren Prichard, Consultant, Assembly Republican Caucus

June 3, 2025

The Honorable Henry Stern
California State Senate
1021 O Street, Suite 7710
Sacramento, California 95814

RE: SB 483 (Stern): Mental Health Diversion
As Amended May 23, 2025 – REMOVE OPPOSITION

Dear Senator Stern:

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Public Administrators, Public Guardians, and Public Conservators (CAPAPGPC), we are writing to share that we are removing our opposition to your Senate Bill 483. Our associations are appreciative that county concerns identified in our coalition letter dated May 13, 2025, are addressed in the latest amendments.

The previous version of SB 483, as introduced, would have added an additional requirement for the court to approve the recommended mental health treatment, undermining the assessment currently done by behavioral health professionals and unnecessarily complicating and slowing down processing and placement of individuals seeking treatment by way of diversion. However, the latest amendments to SB 483 would now simply require that the defendant agrees to the recommended treatment plan and agrees to comply with the treatment as a condition of diversion.

For these reasons, CSAC, UCC, RCRC, and CAPAPGPC are pleased to remove our opposition to SB 483. Please do not hesitate to reach out with any questions.

Sincerely,

Jolie Onodera
Senior Legislative Advocate
California State Association of Counties
jonodera@counties.org
916-591-5308

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org
916-447-4806

Kelly Brooks-Lindsey
Legislative Representative
UCC
kbl@hbeadvocacy.com
916-753-0844

Tom Scott
Executive Director
CAPAPGPC
tscott@capapgpc.org
916-382-4757

cc: Honorable Members and Consultants, Senate Public Safety Committee
Honorable Members, California State Senate

July 30, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 5610
Sacramento, CA 95814

RE: SB 485 (Reyes) – Appointment of County Public Defender
As amended 4/7/2025 – Oppose Unless Amended
Awaiting hearing – Assembly Appropriations Committee

Dear Chair Wicks:

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we write to respectfully express our joint opposition to SB 485, unless the measure is amended to include provisions to establish essential checks and balances regarding the appointment and removal of board of supervisors-appointed county public defenders.

SB 485 proposes to change the public defender's employment status from at-will to one in which removal may only occur by a majority vote of the local board of supervisors and only for neglect of duty, malfeasance, misconduct in office, or other good cause. While we understand and respect the underlying objective to ensure independence in this important role, we believe the bill, as currently written, lacks key structural safeguards. Our request for amendments is rooted in principles of good governance, organizational consistency, and process clarity – standards we would be seeking to accompany statutory changes in the employment status for any appointed county department head.

As it relates to fiscal impacts, it is our assessment that SB 485 would impose local costs in two specific areas:

- Work associated with establishing procedures for managing the new employment status for public defenders and for implementing said procedures going forward; and
- Exposure to litigation for future terminations of public defenders under new for-cause terminations.

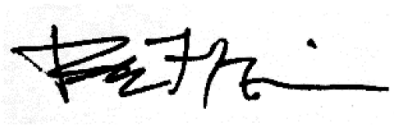
Although we understand that your committee primarily is focused on cost implications, we feel it is incumbent upon us to articulate the policy reasons behind our continued opposition to the bill, given that modest amendments that would align the changes to the appointed public defender's employment status to that of the county counsel have thus far been rejected. CSAC, UCC, and RCRC remain concerned about the long-term implications of a perpetual appointment if it is not paired with routine performance oversight or a structured review process. The county associations' proposed amendments – to establish a defined four-year term and to set forth a

clear process for judicial review should a public defender contest their removal from office -- are needed to ensure that all department heads are held to the same standards to meet their various responsibilities adequately. Public accountability is an essential element of county governance, and it is both reasonable and prudent to provide clear procedures in the event of a contested termination.

As organizations representing California's elected county supervisors, we urge the Legislature's consideration of these amendments, which seek to (1) ensure appropriate governance safeguards and (2) maintain comparability across appointed county leadership positions. ***If this measure were enacted without these amendments, the public defender's employment status would be an outlier in the broader county organizational framework for non-elected department heads.*** Our proposed changes are not intended to – and would not in practice – interfere with a public defender's constitutional obligation to provide clients with ethical and competent legal representation.

Please feel free to contact Ryan Morimune at CSAC (rmorimune@counties.org), Elizabeth Espinosa at UCC (ehe@hbeadvocacy.com), or Sarah Dukett at RCRC (sdukett@rcrcnet.org) for any questions on our associations' perspectives. Thank you.

Sincerely,



Ryan Morimune
Senior Legislative Representative
CSAC

Elizabeth Espinosa
Legislative Representative
UCC

Sarah Dukett
Policy Advocate
RCRC

Cc: The Honorable Eloise Gómez Reyes, Member of the Senate
Members and Consultants, Assembly Appropriations Committee

August 9, 2025

The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 487 (Grayson) – Workers' Compensation Third Party Recovery
OPPOSED, AS AMENDED ON 7/8/25

Dear Chair Wicks,

The undersigned organizations are respectfully opposed to **SB 487**, which would limit the right of public agency employers, including the State of California, to recover the cost of providing workers' compensation benefits when a law enforcement officer or firefighter is injured at work and a third party is partially or entirely responsible. Public safety officers enjoy generous salary continuation benefits, presumptions for several types of injuries and illnesses, and Industrial Disability Retirement (IDR) benefits that aren't available to any other type of worker in the state. As a result, state and local governments have a higher cost of providing workers' compensation benefits to police officers and firefighters, and recovering costs from responsible third parties is vitally important to protect public resources and the taxpayers.

<u>No Data to Justify Proposed Policy</u>
The legislature has a strong history of closely examining proposed workers' compensation policy changes through the joint labor-management Commission on Health and Safety and Workers' Compensation (CHSWC). According to the CHSWC website, it was created in 1993 to examine health

and safety and workers' compensation systems and recommend administrative or legislative modifications to improve their operation. In recent years, the legislature has often turned to CHSWC for answers when, much like with SB 487, they are confronted with proposed workers' compensation legislation that is based largely on anecdote instead of data.

When an employee is injured by a third party during the course and scope of their employment, the employer, regardless of who is at fault, must provide full workers' compensation benefits. This includes all forms of disability, both temporary and permanent, any associated expenses and vocational rehabilitation if applicable. In addition, the employer is bound to provide medical treatment for the duration of that employee's life for the injured body parts or conditions. An example of an injury sustained at the fault of a third party is when a motor vehicle accident occurs outside of the employer's premises and outside of the employer's control. Regardless, the employer is still obligated to provide all statutory workers' compensation benefits to the employee. As such, the employer's only remedy for reimbursement of the costs incurred because of another party is via subrogation recovery.

The public sector entities affected by SB 487 have limited resources available to provide services to the public. If the legislature is going to upend well-established public policy related to third party subrogation, it should do so only after being fully informed. Proponents of SB 487 have not provided any objective evidence suggesting law enforcement and firefighters are frequently facing bad outcomes in third party litigation related to workplace injuries.

Special Benefits Mean Less Economic Harm for Workers and Higher Costs for Employers

The state and local government employers of police officers and firefighters have high workers' compensation costs precisely because their union representatives have lobbied endlessly for expensive special benefits designed to minimize the economic impact of workplace injuries.

Most employees who are unable to work because of their workplace injury are paid temporary disability benefits at a rate of 2/3 of their average weekly wage, with a maximum benefit amount of $1,680.29 per week in 2025. Instead of receiving normal temporary disability benefits, law enforcement and firefighters who are unable to work because of their workplace injury are paid their *full salaries tax free for an entire year* under Labor Code Section 4850. While it may be hard to believe, those who are receiving benefits under Labor Code Section 4850 take home more than when earning their normal salary. The special benefits both minimize the economic harm to the injured employee and cause the employer to have higher costs associated with the injury.

In addition, a law enforcement or firefighter who is hurt on the job and, as a result, is permanently unable to perform their current position is eligible for Industrial Disability Retirement. The base benefit for IDR is 50% of the final compensation amount, but it can get higher (3% for each year of service), *and the first 50% is non-taxable*. Depending on their tenure, law enforcement and firefighters with longer years of service can take home more pay under IDR than they did while working because of the tax treatment. This amount is paid to the injured employee, in addition to permanent disability benefits paid under the workers' compensation system that are designed to compensate for physical impairment from the injury. Law Enforcement personnel and firefighters receiving IDR benefits are not precluded from working outside of their classification in other occupations, and working does not reduce the IDR benefit. As a result, many police officers and firefighters receiving IDR benefits are also gainfully employed.

Law Enforcement and firefighters already received costly special benefits that protect them from economic harms associated with injuries. The legislature should more closely examine the need to also

allow these employees to recover from responsible third parties before their employer who has financed generous special benefits. Benefits paid to first responders come directly out of public agency budgets. State and local governments generally aren't covered by traditional insurance, rather are self-insured, so the costs associated with SB 487 will directly hit their budgets.

For these reasons, the undersigned organizations are respectfully **OPPOSED** to **SB 487** and urge your no vote when the bill is heard in the Assembly Appropriations Committee.

Sincerely,

California Association of Joint Powers Authorities
California Coalition on Workers' Compensation
California Joint Powers Insurance Authority
California Special Districts Association
California State Association of Counties
City of Bell
City of Chula Vista
City of Corona
City of Santa Barbara
County of Butte
County of Fresno
County of Humboldt
County of Kings
County of Placer
Golden State Risk Management Authority
League of California Cities
Local Agency Workers' Compensation Excess JPA
Northern California Special Districts Insurance Authority
Public Risk, Innovations, Solutions, and Management
Rural County Representatives of California
School's Insurance Authority
Urban Counties of California

CC: The Honorable Tim Grayson, California State Senate
Members and Consultants, Assembly Appropriations Committee
The Honorable Gavin Newsom, California State Governor
Department of Industrial Relations

July 2, 2025

The Honorable Liz Ortega
Chair, Assembly Labor and Employment Committee
1020 N Street, Room 155
Sacramento, CA 95814

RE: SB 617 (Arreguín): California Worker Adjustment and Retraining Act
As amended June 27, 2025 – SUPPORT
To be heard in the Assembly Committee on Labor and Employment July 9, 2025

Dear Assemblymember Ortega,

On behalf of the California State Association of Counites (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC), we are pleased to support SB 617, which will strengthen the Worker Adjustment and Retraining Act by increasing information in Worker Adjustment and Retraining Notifications (WARN) on dislocated worker assistance, CalFresh benefits, and promote coordination between employers and local service providers, including local workforce development boards (LWDBs).

Current state law mandates that certain employers notify stakeholders of mass layoffs, including LWDBs, 60 days before the mass layoff via WARN letters. This proposal builds upon this foundation by expanding the notification to include information about employers' plans to provide dislocated worker assistance and require notification about CalFresh benefits. Employers will be required to declare their plan to offer services and provide contact information for both a company representative and the LWDB, as well as a list of free LWDB services. This ensures affected workers have immediate access to vital support upon notification and enables LWDBs to tailor their assistance effectively. Additionally, recent amendments require inclusion of information about CalFresh benefits, including the CalFresh benefits helpline and a link to the CalFresh benefit website.

By providing this crucial information, we believe SB 617 will improve the efficacy of WARN notices and, more importantly, ease the challenging transition for displaced workers.

For these reasons, we are proud to support SB 617. Should you have any questions regarding our position, please do not hesitate to contact me at elawyer@counties.org.

Sincerely,

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties
elawyer@counties.org

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
jkh@hbeadvocacy.com

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

CC: The Office of the Honorable Jesse Arreguín, California State Senate
Members and Consultants, Assembly Labor and Employment Committee
Megan Lane, Chief Consultant, Assembly Labor and Employment Committee
Lauren Prichard, Consultant, Assembly Republican Caucus

June 26, 2025

The Honorable Juan Carillo
Chair, Assembly Local Government Committee
1021 O Street, Suite 5610
Sacramento, CA 95814

Re: **SB 635 (Durazo): Food vendors and facilities: enforcement activities**
As amended 5/29/25 – CONCERNS
Set for hearing 6/02/25 – Assembly Local Government Committee

Dear Assembly Member Carrillo:

On behalf of the California Association of Environmental Health Administrators, the Urban Counties of California (UCC), and the California Association of Code Enforcement Officers, we write to share our concerns regarding Senate Bill 635, Senator Durazo's measure that would prohibit a local agency that regulates street vendors or enforces sidewalk vending regulations from collecting and sharing certain information about the vendor, contracting with a private entity to provide enforcement services, and to preclude background checks as a requirement for licensure. While we recognize the need to protect vulnerable populations from certain immigration actions, we also feel strongly about ensuring a robust regulatory program that protects public health and safety, which are jeopardized in an unregulated food vendor environment. As we have communicated to the author and sponsors, we seek to ensure our ability to maintain an effective local licensing and enforcement program while respecting California's diversity and values.

We recognize that small food businesses are vital members of our communities. Our goal is not to push these vendors away from compliance, but to bring them into a regulatory framework that supports safe operations, fair enforcement, and long-term success. Local agencies have expended significant resources to enact local licensing and enforcement programs that aim to support vendor compliance, minimize costs, and operate respectfully and fairly; these programs have sought to address regulatory challenges related to time, place, and manner of food vending, as well as ensure adherence to food safety regulations. To that end, there are three areas of concern that we have identified:

Collection and Sharing of Information. To operate an effective licensing program, local agencies need to collect personally identifiable information to appropriately license and regulate these vendors. It is important to stress that we are not interested in collecting information related to a vendor's immigration

or citizenship status and are not interested in sharing such information with the federal government. However, maintaining a database of licensees that is to be kept confidential separately from other vendors will be a costly challenge. Further, SB 635 contains no explicit exemption from the California Public Records Act; otherwise, this information would be subject to disclosure under existing law. Finally, the mandate contained in the bill to destroy records is a significant policy shift with cost and operational implications.

Bar on Contracting. SB 635 prohibits a local agency from utilizing a contracted entity to assist in compliance with a local vending ordinance. Enforcement can be a costly and challenging effort and contracting that activity to a vendor may be the most effective use of taxpayer resources. While we believe that existing local government statutory requirements are sufficient to ensure that contractors appropriately maintain information in compliance with state and local requirements, we are open to clarifying amendments that reiterate these protections. Again, we are not interested in contracting with entities that may share sensitive information with the federal government; we are only interested in ensuring an effective licensing program.

Background Checks. We recognize concerns raised by some about the chilling effect certain background check procedures may have, particularly among immigrant communities. Our intent is not to collect or share information about immigration status, and we are open to language that ensures procedures are non-discriminatory and privacy-protective. We are happy to explore language prohibiting the use of Live Scan for vendors and instead favoring background checks for sidewalk vending permits conducted by local Police Departments (already prohibited from working with federal immigration authorities via SB 54) using a date of birth and driver's license number. These background checks do not involve fingerprinting, and the information is not shared with state or federal agencies. This approach allows us to conduct background checks in a way that is equitable, privacy-conscious, and culturally sensitive.

We understand and commend the intent behind SB 635 but would appreciate the committee's consideration of language that ensures that local agencies can preserve a licensing program for sidewalk and roadside food vending that protects the public's health and safety at a reasonable cost while supporting the full economic participation of food vendors in our communities. We believe that thoughtfully crafted amendments can support the bill's goals while preserving essential local tools — ultimately benefiting vendors, consumers, and communities alike.

We appreciate your consideration of our request. Please don't hesitate to reach out if we can be of additional assistance.

Sincerely,

Faith Borges	Jean Kinney Hurst	Amanda Bloom
On behalf of CACEO	On behalf of UCC	CAEHA

cc: Members and Consultants, Assembly Local Government Committee
The Honorable Maria Elena Durazo, California State Senate

July 10, 2025

The Honorable Juan Carrillo
Chair, Assembly Committee on Local Government
1020 N Street, Room 157
Sacramento, CA 95814

RE: SB 707 (Durazo): Open meetings: meeting and teleconference requirements
As Amended July 8, 2025 – SUPPORT
Set to be heard in the Assembly Committee on Local Government July 15, 2025

Dear Chair Carrillo,

The California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and Urban Counties of California (UCC) write in proud support of SB 707 (Durazo). SB 707 would represent the most extensive changes to the Brown Act in several years, with a variety of changes designed to improve public participation in local government meetings, expand accessibility for members and the public, and includes several provisions that address the needs of local governments. In total, SB 707 represents a balanced approach in the modernization of the Brown Act.

Since late-2024, we have enjoyed a strong working relationship with the Senator, committee staff, and the variety of stakeholders representing local government organizations, civil liberties, the press, and open government advocates. It's often said that the definition of compromise is when no party is satisfied. However, there's reasons for everyone to be satisfied with this law, including:

- Improved accessibility for the public through remote participation provisions, agenda translation, accommodation of interpretation services, outreach provisions, and increased requirements for how agendas and meeting materials are displayed for the public;
- Improved accessibility for members of Brown Act bodies, including extension of the sunset date for existing remote meeting options, new flexibility for advisory body members, new flexibility for multi-jurisdictional body members, clarification that remote disruption of meetings (e.g. "Zoombombing,") can be addressed, and expansion of emergency meeting provisions; and

- Accountability measures, including expanded requirements regarding reporting of closed session decisions for the compensation of department heads and administrative officers, allowing District Attorneys additional time to submit a cease and desist letter for meeting violations, and impose additional restrictions on the use of special meetings for decisions on compensation for a legislative body.

To be clear, there are remaining issues we would like to address in this bill, and we look forward to continuing our efforts with the Senator to address them. To that end, we share the following concerns and suggestions on how to address them.

Remote public comment

Many of our members have concerns about the requirements for providing remote public comment at meetings. These include concerns about cost, as well as concerns regarding impacts to the duration of meetings. We understand the need to balance the provisions of this bill that provide additional public accessibility. While we hope these concerns do not come to fruition, and are comfortable with the requirements in the bill today, we would like to revisit this issue in future years if these concerns are realized.

Remote participation by those with disabilities

We appreciate the amendment to Gov. Code § 54953.8.6(a)(2)(A) that provides an exception from the on-camera requirement for those with disabilities that preclude them from appearing on camera. Currently, this needed exception applies only to those who serve on non-decision-making advisory bodies. We believe the exception should apply to any individual who serves on a Brown Act body and request the same language be added to Gov. Code § 54953(c)(2)(A).

Requirement for physical posting of translated agenda

The proposed addition of Gov. Code § 54953.4(b) would provide additional opportunities for the public to access translated meeting information. While this could mean more accessible information for the public, we want to ensure that it does not make local agencies vulnerable to lawsuits. We request that the language in Gov. Code § 54953.4(b)(1)(A)(3) be amended to the following to ensure it meets its intent of shielding agencies from liability:

"…No action shall be commenced or maintained against an eligible legislative body ~~specifically~~ arising from the content ~~or,~~ accuracy, posting, or removal of any translation provided by the eligible legislative body or posted by any person under this section."

Additionally, some counties use electronic kiosks for posting agendas in public facilities. We would prefer to allow those counties to meet this requirement without replacing those systems by allowing them to post translated agendas on those kiosks or online in lieu of the physical posting contemplated by this provision.

Requirements for subsidiary body presentations

We believe the entirety of Gov. Code § 54953.8.6 represents needed flexibility for non-decision-making advisory bodies. The remote meeting flexibility for these advisory bodies will improve civic participation and diverse community representation by making local advisory bodies more accessible – including persons with disabilities, caregivers, and working Californians who may face barriers to attending meetings in person.

We understand the purpose for Gov. Code § 54953.8.6(a)(4)(B), as it is designed to ensure that advisory bodies are heard in an in-person meeting of a legislative body at least once annually. However, given the broad duties of our local bodies and the difficult nature of addressing all matters of public concern at these meetings, we believe some changes are needed to balance the core work of legislative bodies with the participation of advisory bodies.

Additionally, the current language will require *all* advisory bodies to complete an annual report, which not all currently do. This may seem to be a small requirement, but these bodies already face challenges in reaching quorum and lack full-time professional staff.

To that end, we request amendments that remove the requirement that advisory bodies both complete and present an annual report. To better strike the balance of ensuring that advisory body reports are heard, we would appreciate an amendment that allows an advisory body to request a presentation on their recommendations to their legislative body—and require that those presentations not be allowed to be placed on the consent file.

In conclusion, we believe these remaining challenges can be addressed. Once again, we the willingness of Senator Durazo and committee staff to work with local government associations on this critical legislation and look forward to our continued efforts on SB 707.

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we are proud to support SB 707.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
elawyer@counties.org

Sarah Dukett
Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

Jean Hurst
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

cc: The Honorable Senator María Elena Durazo
Members and Consultants, Assembly Local Government Committee
Angela Mapp, Chief Consultant, Assembly Local Government Committee
Sarah Haynes, Consultant, Assembly Republican Caucus

July 30, 2025

The Honorable Laura Richardson
California State Senate
1021 O Street, Suite 7340
Sacramento, CA 95814

Re: **SB 777 (Richardson): Abandoned Cemeteries: Report**
As amended 7/09/25 – REMOVAL OF OPPOSITION

Dear Senator Richardson:

On behalf of our collective memberships, our organizations – the Urban Counties of California (UCC), the California State Association of Counties (CSAC), the Rural County Representatives of California (RCRC), and the League of California Cities (CalCities) – write to share with you the removal of our opposition position on Senate Bill 777.

Since recent amendments focused the bill on a stakeholder-informed discussion and report, our organizations are grateful for the opportunity to work collaboratively with you, the Cemetery and Funeral Bureau, and others to discuss feasible solutions to the issue of abandoned endowment care cemeteries.

We appreciate you and your staff's willingness to consider our concerns.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

Sarah Duket
Senior Policy Advocate
Rural County Representatives of California

Brady Guertin
Legislative Advocate
League of California Cities

URBAN COUNTIES
OF CALIFORNIA

2025 UCC Leadership

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

July 11, 2025

The Honorable Juan Carrillo
Chair, Assembly Local Government Committee
1021 O Street, Suite 5610
Sacramento, CA 95814

Re: **SB 802 (Ashby): Housing finance and development: Sacramento Area Housing and Homelessness Agency: Multifamily Housing Program: Homekey: Homeless Housing, Assistance, and Prevention program**
As amended 6/23/25 – OPPOSE
Set for hearing 7/16/25 – Assembly Local Government Committee

Dear Assembly Member Carrillo:

On behalf of the Urban Counties of California (UCC), I write in respectful opposition to Senate Bill 802, Senator Angelique Ashby's measure that would consolidate regional and housing and homelessness programs and redirect local agencies' funding, including local housing trust funds and local housing ordinance fees, for purposes of providing regional housing and homelessness services. This measure, regrettably, bypasses local decision-making for purposes of consolidating local resources without ensuring equitable, effective, and timely allocation of such resources to the contributing entities; further, we believe that this concept sets a new and troubling precedent for legislating local collaboration without a specific request from participating entities. Urban counties – including the County of Sacramento – are capable of participating in collaborative discussions with their local city and Continuum of Care (CoC) colleagues and their duly elected boards of supervisors are directly accountable to their constituents without the need for additional directives from the Legislature.

SB 802 dramatically restructures governance, funding, and program delivery in the County with a subset of the cities therein in a manner that will likely be disruptive to existing efforts on affordable housing and homelessness programs. SB 802 also unfairly requires that this entity would be "granted priority consideration for all applicable state housing and homelessness funding sources." Presumably, this language would give the new regional entity priority consideration above all of the other urban counties throughout the state in an open-ended list of housing and homelessness grant programs.

The bill also takes the unprecedented step of requiring the redirection of locally imposed fees that have been enacted and collected by the County and City of Sacramento, respectively, in a manner that undermines the connection between locally enacted fees and the services provided by that

local entity. This language would also give authority over these funds to a regional entity that would be super-majority controlled by the representatives of *other* jurisdictions. For instance, in-lieu affordable housing fees generated in unincorporated Sacramento County would be subject to the control of a nine-member Board that only includes three supervisors. We believe this concept potentially violates constitutional requirements for locally imposed fees, as well as the municipal powers of charter jurisdictions. These provisions alone are indicative of the challenges that SB 802 would pose in the region.

Urban counties are deeply engaged in collaborative efforts with their city partners, the nonprofit sector, and philanthropic organizations to do all we can to assist those who experience homelessness in their communities. Measures like SB 802 should only be considered at the request of local jurisdictions and after extensive conversations among stakeholders that establish the purpose, governance, and funding of such a model. As a result, we are respectfully opposed to SB 802.

Sincerely,

Jean Kinney Hurst
Legislative Advocate

cc: Members and Consultants, Assembly Local Government Committee
The Honorable Angelique Ashby, California State Senate
Sacramento County Board of Supervisors