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

ITEM: 2.19
(ID # 30155)
MEETING DATE:
Tuesday, April 28, 2026

FROM : EXECUTIVE OFFICE

SUBJECT: EXECUTIVE OFFICE: Receive and File the Legislative Report for March 2026, [All Districts] [$0]

RECOMMENDED MOTION: That the Board of Supervisors:

1. Receive and File the Legislative Report for March 2026.

ACTION:Policy

Carolina Salazar Herrera, Director of Legislative Advocacy 4/24/2026

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Perez, 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:	April 28, 2026
xc:	EO

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

BACKGROUND:

Summary

Board Policy A-27 states that the Executive Office will provide regular updates to the Board of Supervisors on legislative advocacy efforts. In alignment with this requirement, the Executive Office is submitting the following materials. These attachments reflect the County's ongoing State and Federal advocacy efforts and outreach, as well as partner association activity.

General Legislative Letters Sent

This attachment includes all outgoing County legislative correspondence transmitted during the reporting period. Letters reflect formal positions taken consistent with the County's Legislative Platform and coordinated through the Executive Office, which serves as the central clearinghouse for advocacy communications.

Over the past several months, the Executive Office has led a comprehensive and coordinated effort to advance the County's federal priorities, including proactive engagement on Community Project Funding (earmarks). This work has included guiding departments through eligibility reviews and application development for FY27 earmark requests and assisting in the preparation of letters of support and federal forms. Our federal lobbying firm, Van Scoyoc and Associates, has prepared a memo which provides an update on the County's FY27 CPF requests, outlines the next steps for those that advanced, and previews early actions and preparations for the FY28 cycle.

Under the leadership and direction of the Board of Supervisors, as detailed in Board Item #30157 on March 4, 2026, the Executive Office has worked closely with County departments and statewide associations to prepare and refine detailed communication materials and advocacy strategies related to House Resolution (H.R.) 1, the "One Big Beautiful Bill Act."

Bill List and Letters Sent

A comprehensive list of all State and Federal bills on which the County has taken a formal legislative position is attached and also available on the County's Legislative Advocacy website at https://rivco.gov/legislative-advocacy-what-we-are-doing. Each bill and recommended position was reviewed by subject matter experts in the impacted departments and coordinated through the Executive Office, as required by Board Policy A-27, to ensure alignment with the Board approved Legislative Platform. Copies of all letters issued by the Board are included.

Outreach and Communications Report

A summary of outreach conducted in support of the County's legislative priorities by County leadership, including participation in lobby days in Sacramento and Washington, D.C., as well as scheduled meetings with state and federal elected officials.

Association Letters Sent

Copies of correspondence issued by the California State Association of Counties (CSAC), Urban Counties Caucus (UCC), and National Association of Counties (NACo) relevant to County priorities.

ATTACHMENTS:

General Legislative Correspondence
Bill List and Letters Sent
Outreach and Communications Report
Association Letters Sent

CORRESPONDENCE

COMMUNITY PROJECT FUNDING (EARMARKS)

VAN SCOYOC ASSOCIATES

MEMORANDUM

TO: Riverside County
FROM: Van Scoyoc Associates
DATE: April 22, 2026
RE: FY 2027 Federal Appropriations Funding Update

On April 17, Members of the U.S. House of Representatives were required by the House Appropriations Committee to post on their websites the list of FY 2027 Community Project Funding (CPF) requests which they submitted to the panel for consideration. While the Senate Appropriations Committee also requires each Senator to post their FY 2027 Congressional Directed Spending requests on their individual websites, those deadlines have not yet been established.

However, we wanted to take this opportunity to provide the RivCo team with a list of County submitted FY27 CPF requests which were advanced to the Appropriations Committee by its House Congressional delegation members. *It should be noted that the project requested funding level forwarded to the Committee by House Members does not typically reflect the amount of funding which will be included in the legislation*.

The following includes the FY27 County CPF requests which were:

1. Submitted by House Delegation Members
2. Not Submitted by House Delegation Members
3. Supported by the County and submitted by House Delegation Members

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Rep. Raul Ruiz (D-25)

Submitted

- Riverside County/ San Gorgonio Memorial Healthcare District's Diagnostic Imaging Modification and Women's Access Project (*$5.6 million, Labor/HHS/Education)*
- Jacqueline Cochran Regional Airport Control Tower, Phase 1 (*$10 million, Transportation/HUD)*

Supported by County

- Cathedral City - Varner Road widening from two to six lanes with median, intersections, flood control, bike/ped path, and fiber infrastructure. *($20 million, Transportation/HUD*)

Rep. Ken Calvert (R-41)

Submitted

- French Valley Regional Airport Control Tower, Phase 2 *($5 million, Transportation-HUD*)
- Riverside County Sheriff's Office Real Time Intelligence Center East Project (*$1 million, Commerce, Justice, Science)*

Supported by County

- City of Menifee's McCall Boulevard/1-215 Interchange Project *($2.5 million, Transportation-HUD*)

Rep. Mark Takano (D-39)

Submitted

- Riverside County Department of Waste Resources North Slope Terminus Remediation Project (*$772,415, Interior/EPA)*

Not Submitted

- Box Springs *($1 million, Transportation-HUD)*
- Trujillo Adobe *($5 million, Transportation-HUD*)

Supported by County

- RCTC's Mead Valley Metrolink Station Mobility Hub Project ($3 *million, Transportation-HUD*)

Rep. Darrell Issa (R-48)

Submitted

- Murrieta Creek Flood Control, Environmental Restoration, and Recreation Project (*$43,393,350, Energy & Water)*

Not Submitted

- Thermal Imaging Cameras for Riverside County Fire (*$869,000, Transportation-HUD)*
    - *Rep. Issa favored this County project and sought to submit it to the Appropriations Committee, but the Committee is not allowing any equipment-related requests through HUD-EDI (vehicles excluded) this cycle – even though some were submitted and funded in FY 2026 appropriations process.*

Rep. Young Kim (R-40)

Not Submitted

- Santa Ana River Trail *($5 million, Transportation-HUD)*

Supported by County

- RCTC and OCTA - State Route 91 East Corridor Operations Project ($*15 million, Transportation-HUD*)

Rep. Norma Torres (D-35)

No County projects were submitted to Rep. Torres in the FY27 appropriations process

Next Steps on FY27 CPF Projects Advanced by House Members

For the FY27 CPF projects which have been submitted by RivCo's House Members, we are closely watching the fast-moving House Appropriations bill mark-up schedule. We expect to see CPF tables posted by the House Appropriations Committee on the day of the Subcommittee mark-up. The current House Appropriations Subcommittee mark-up schedule for those bills to which County-submitted FY27 CPF requests have been advanced is as follows:

- Thursday, April 30: Commerce, Justice, Science
  - *Riverside County Sheriff's Office Real Time Intelligence Center East Project*
- Friday, May 15: Energy and Water
  - *Murrieta Creek Flood Control Project*
- Thursday, May 21: Transportation-HUD and Interior-EPA
  - *French Valley Regional Airport Control Tower, Phase 2*
  - *Jacqueline Cochran Regional Airport Control Tower, Phase 1*
  - *North Slope Terminus Remediation Project*
- Friday, June 5: Labor-HHS-Education
  - *San Gorgonio Memorial Healthcare District's Diagnostic Imaging Modification and Women's Access Project*

FY27 Senate Congressionally-Directed Spending

As mentioned earlier, we are still awaiting the FY27 Senate Congressionally-Directed Spending (CDS) project requests to be posted on Senator's websites. The County submitted the following four projects to Sens. Padilla and Schiff which were **not** advanced on the House side. Those CDS projects include:

- Box Springs *($1 million, Transportation-HUD)*
- Trujillo Adobe *($5 million, Transportation-HUD*)
- Santa Ana River Trail (*$5 million, Transportation-HUD)*
- Corrections Body Worn Cameras *($5 million, Commerce, Justice, State)*

VSA will report back to the County once the Senator Padilla and Schiff's FY27 CDS are posted on their respective websites.

Early Preparations for the FY 2028 Appropriations Cycle

At the appropriate time, and in collaboration and coordination with the County's Government Relations team, VSA will review the FY27 CPF application submissions which were not advanced by the County's Congressional Delegation and offer possible suggestions strengthen the application for a future submission. We will also seek feedback from those Delegation offices as to understand the reason(s) why those projects were not selected. Broadly, our aim will be to work with the County several months in advance of next year's deadlines to help ensure the County's CPF projects are compelling, submissions are strong, and deadlines are met.

Additionally, we encourage County department representatives to review the RivCo House Delegation's full list of FY27 project submissions as this may assist in developing ideas and thoughts on potential County project selections for the FY 2028 cycle.

Links to the Delegation's project lists are directly below. Rep. Issa's list is not included given that he will not be seeking re-election next year. However, we have added the FY27 community funding project links for Reps. Obernolte and Aguliar who – should they be re-elected – will be new House Riverside County delegation members starting next year. Obernolte and Aguliar will be inheriting small portions of the county in the next Congress due to the redrawn Prop 50 redistricting boundaries.

- **Rep. Ken Calvert (R-41)**
- **Rep. Raul Ruiz (D-25)**
- **Rep. Mark Takano (D-39)**
- **Rep. Norma Torres (D-35)**
- **Rep. Young Kim (R-40)**
- **Rep. Jay Obernolte (R-23)**
- **Rep. Pete Aguilar (D-33)**

Also, here is the link to the House's FY27 CPF Appropriations Guidance. We felt it would be useful to attach this year's House guidance to this memo so it can be easily referenced as a refresher to understanding eligible project types. While we realize next year's (FY 2028) House guidance will likely be modified in some ways – especially if the Democrats win the majority – it's expected that much of the core elements of the guidance will be retained. For the County's eligible project request types, the primary CPF guidances for the departments to review will be for those accounts contained within the following measures:

- Transportation and Housing and Urban Development
- Labor, Health and Human Services, and Education
- Interior and Environment
- Commerce, Justice, and Science (*Sheriff's Department*)
- Homeland Security
- Energy and Water (*Riverside County Flood Control and Water Conservation District*)

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

March 6, 2026

The Honorable Darrell Issa
United States House of Representatives
2108 Rayburn House Office Building
Washington, D.C. 20515

Re: Support of FY27 Congressionally Directed Spending (CDS) for Thermal Imaging Cameras

Dear Representative Issa:

On behalf of the County of Riverside Board of Supervisors, I write in support of Riverside County Fire's CDS request to fund 127 thermal imaging cameras (TICs).

Riverside County Firefighters use TICs to enhance their ability to see in low visibility conditions, like smoke, darkness, or fire, by detecting the heat emitted by objects and people. These cameras work by capturing infrared radiation, which is emitted by all objects based on their temperature. Here's how firefighters use them:

1. Locating Fire Sources: TICs help firefighters identify the hottest areas, which can help them to locate the fire's origin or potential hotspots, even if it's obscured by smoke or walls.
2. Search and Rescue: Thermal cameras are used to find people in danger. They can detect the heat emitted by a person's body, making it easier for firefighters to locate victims who may be trapped or unconscious in areas of low visibility.
3. Navigating Hazardous Areas: The camera allows firefighters to see through smoke or darkness, helping them navigate buildings more safely, especially in situations where they might otherwise lose their bearings.
4. Assessing Structural Integrity: Firefighters can use the camera to detect temperature variations in walls, floors, or ceilings. This helps them assess whether certain structures are weakening from the heat, potentially preventing accidents like collapses.

5. Determining Fire Extinguishing Progress: By using the thermal camera, firefighters can assess whether a fire has been fully extinguished or if there are still pockets of heat that need attention.
6. Hazard Identification: In some cases, TICs can help identify hazardous materials based on temperature differences, alerting firefighters to potential dangers such as hot chemicals or electrical fires.

Unfortunately, the vendor that has been used by Riverside County Fire has stopped manufacturing these cameras and is no longer supporting the operation and maintenance of them, requiring the replacement of the TICs county-wide. By purchasing 127 new TICs, Riverside County Fire will be able to continue to provide this critical piece of equipment in every fire engine at each Riverside County Fire station, including stations in every contract city. Because Riverside County spans over 7,200 square miles with 2.5 million residents, this sort of widespread distribution of public safety equipment is crucial.

Thank you for your consideration of this request. 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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

March 2, 2026

The Honorable Alex Padilla
United States Senate
331 Hart Senate Office Building
Washington, D.C. 20510

Subject: Support CDS Funding for New Regional Arterial in the Communities of Hemet, San Jacinto, and Winchester

Dear Senator Padilla:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Riverside County Transportation Commission's (RCTC) Congressionally Directed Spending request for $3 million to fund a new regional arterial in the communities of Hemet, San Jacinto, and Winchester adjacent to State Route 79 (SR-79). The project aims to build a 12-mile facility with a safer, more direct route for travelers. The project advances the County of Riverside's goal of "connected communities" and RCTC's long-standing mission to provide a safe, interconnected, multimodal transportation system. Benefits of the project include:

- **Deliver critical improvements to growing region –** Communities in the San Jacinto Valley are among the fastest growing in the nation and are in need of transportation solutions to match that growth. The project would better connect travelers and residents to their destinations.
- **Support tourism and economic growth** – The project will strengthen access to and connectivity between destinations in the San Jacinto Valley, Temecula Valley, San Gorgonio Pass, and Coachella Valley. Residents and travelers alike will benefit from a more direct connection to major highways, including Interstate 215 to the west, State Route 60 to the north, and Interstate 15 to the south.
- **Advance multimodal transportation options** – The project increases travel choice by investing in transit improvements and active transportation.

As the region's population and economy continue to grow, so does the need for expanded transportation infrastructure. Riverside County residents endure some of the longest commutes in the region. Riverside County is the 10th most populous county in the nation and has led the state in domestic migration since 2020 due to housing availability and economic opportunities. Now, Riverside County is expected to add 500,000 residents by 2048. Meanwhile, 40 percent of the nation's goods travel from the Ports of Long Beach and Los Angeles through the region to destinations across the country. Our transportation system cannot keep up, leaving families and businesses behind in traffic. The project will go a long way to accommodate continued population, goods movement, and economic growth in Riverside County.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

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March 2, 2026

The Honorable Adam Schiff
United States Senate
112 Hart Senate Office Building
Washington, D.C. 20510

Subject: Support CDS Funding for New Regional Arterial in the Communities of Hemet, San Jacinto, and Winchester

Dear Senator Schiff:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Riverside County Transportation Commission's (RCTC) Congressionally Directed Spending (CDS) request for $3 million to fund a new regional arterial in the communities of Hemet, San Jacinto, and Winchester adjacent to State Route 79. The project aims to build a 12-mile facility with a safer, more direct route for travelers. The project advances the County of Riverside's goal of "connected communities" and RCTC's long-standing mission to provide a safe, interconnected, multimodal transportation system. Benefits of the project include:

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As the region's population and economy continue to grow, so does the need for expanded transportation infrastructure. Riverside County residents endure some of the longest commutes in the region. Riverside County is the 10th most populous county in the nation and has led the state in domestic migration since 2020 due to housing availability and economic opportunities. Now, Riverside County is expected to add 500,000 residents by 2048. Meanwhile, 40 percent of the nation's goods travel from the Ports of Long Beach and Los Angeles through the region to destinations across the country. Our transportation system cannot keep up, leaving families and businesses behind in traffic. The project will go a long way to accommodate continued population, goods movement, and economic growth in Riverside County.

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Chair, County of Riverside Board of Supervisors

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March 2, 2026

The Honorable Ken Calvert
United States House of Representatives
2205 Rayburn House Office Building
Washington, D.C. 20515

Subject: Support CPF Funding for the Interstate 15 Express Lanes Project Southern Extension

Dear Representative Calvert:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Riverside County Transportation Commission's (RCTC) Community Project Funding (CPF) request for $10 million to fund the Interstate (I) 15 Express Lanes Project Southern Extension (Project). The Project extends the existing I-15 Express Lanes an additional 15.8 miles from El Cerrito Road in Corona to State Route 74 (Central Avenue) in Lake Elsinore. The Project will continue to advance the County of Riverside's goal of "connected communities" and RCTC's mission to provide an interconnected, multimodal transportation system in Riverside County. The Project will help:

- **Promote Safety** – Enabling passenger vehicles to travel in dedicated lanes separated from trucks, which rely upon the I-15 corridor to deliver goods from the ports.
- **Increase Travel Time Reliability and Mobility Choice** – Enhance the flow of traffic by providing a reliable travel time alternative within the corridor while encouraging carpooling and use of express bus service.
- **Expand Regional Economic Competitiveness** – Promote international and interstate commerce by enhancing mobility between major international ports.

As the region's population and economy continue to grow, so does the need for expanded transportation infrastructure. Riverside County residents endure some of the longest commutes in the region. Riverside County is the 10th most populous county in the nation and has led the state in domestic migration since 2020 due to housing

availability and economic opportunities. Now, Riverside County is expected to add 500,000 residents by 2048. Meanwhile, 40 percent of the nation's goods travel from the Ports of Long Beach and Los Angeles through the region to destinations across the country. Our transportation system cannot keep up, leaving families and businesses behind in traffic. The Project will go a long way to accommodate continued population, goods movement, and economic growth along the I-15 corridor.

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 Karen Spiegel
Chair, County of Riverside Board of Supervisors

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March 2, 2026

The Honorable Young Kim
United States House of Representatives
2439 Rayburn House Office Building
Washington, D.C. 20515

Subject: Support CPF Funding for the State Route 91 Eastbound Corridor Operations Project

Dear Representative Kim:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Riverside County Transportation Commission's (RCTC) Community Project Funding (CPF) request for $10 million to fund the State Route 91 Eastbound Corridor Operations Project (91 ECOP). The project enhances mobility by adding an eastbound lane along State Route (SR) 91 from the State Route 241 Toll Road connector to the SR-71 connector in Corona. The project advances the County of Riverside's goal of "connected communities" and RCTC's mission to provide a safe, interconnected transportation system that supports and facilitates economic growth, by providing the following benefits:

- **Promote Safety** – Alleviating traffic merging, diverging, and weaving will promote traveler safety and improve traffic flow.
- **Support and Facilitate Economic Growth** – Enhancing the flow of commerce by better connecting drivers with economic, education, and job centers across the region.
- **Improve Mobility** – Adding a lane will reduce delays and improve travel between Riverside and Orange Counties and reduce traffic impacts on local roads and neighborhoods.

As the region's population and economy continue to grow, so does the need for expanded transportation infrastructure. Riverside County residents endure some of the longest commutes in the region. Riverside County is the 10th most populous county in

the nation and has led the state in domestic migration since 2020 due to housing availability and economic opportunities. Now, Riverside County is expected to add 500,000 residents by 2048. Meanwhile, 40 percent of the nation's goods travel from the Ports of Long Beach and Los Angeles through the region to destinations across the country. Our transportation system cannot keep up, leaving families and businesses behind in traffic. The Project will go a long way to accommodate continued population, goods movement, and economic growth along the SR-91 corridor.

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,

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March 2, 2026

The Honorable Mark Takano
United States House of Representatives
2078 Rayburn House Office Building
Washington, D.C. 20515

Subject: Support CPF Funding for the Mead Valley Metrolink Station/Mobility Hub Project

Dear Representative Takano:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Riverside County Transportation Commission's (RCTC) Community Project Funding (CPF) request for $3 million to fund the Mead Valley Metrolink Station/Mobility Hub Project (Project). The Project will enhance transportation infrastructure to better serve the fast-growing communities of Mead Valley and Perris, advancing the County's goal of "connected communities". Project benefits include:

- **Expand Transportation Access –** The Project establishes a new Metrolink station where none currently exists, better connecting residents to jobs, education, and recreation.
- **Reduce Congestion –** The unincorporated community of Mead Valley is rapidly emerging as a center of growth for both housing and economic opportunities in Riverside County, underscoring the need for additional modes of transportation for residents and families. Establishing a new travel choice for residents will free up space on congested roads and highways.
- **Improve Connectivity –** Nearby investments, including the Moreno Valley/March Field Station, Metrolink Double Track Project: Moreno Valley to Perris, and the expansion of the Perris-South Metrolink Station and layover facility, have been instrumental in the development of our passenger rail and bus transit system in Riverside County. The Mead Valley Metrolink Station/Mobility Hub Project is the next step to deliver the long-envisioned goal of passenger rail service to Mead Valley and surrounding communities.

As the region's population and economy continue to grow, so does the need for expanded transportation infrastructure. Riverside County residents endure some of the longest commutes in the region. Riverside County is the 10th most populous county in the nation and has led the state in domestic migration since 2020 due to housing availability and economic opportunities. Now, Riverside County is expected to add 500,000 residents by 2048. Meanwhile, 40 percent of the nation's goods travel from the Ports of Long Beach and Los Angeles through the region to destinations across the country. Our transportation system cannot keep up, leaving families and businesses behind in traffic. The Project will go a long way to accommodate continued population, goods movement, and economic growth along the State Route 91 and Interstate 215 corridors.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

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March 2, 2026

The Honorable Mark Takano
United States House of Representatives
2078 Rayburn House Office Building
Washington, D.C. 20515

Subject: Support CPF Funding for the Metrolink Double Track Project: Moreno Valley to Perris

Dear Representative Takano:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Riverside County Transportation Commission's (RCTC) Community Project Funding (CPF) request for $3 million to fund the Metrolink Double Track Project: Moreno Valley to Perris (Project). The project advances the County of Riverside's goal of "connected communities" and is a vital component of RCTC's vision to provide interconnected, multimodal transportation solutions in the rapidly growing communities of the Perris Valley, San Jacinto Valley, and southwestern Riverside County. Project benefits include:

- **Support Mobility Choice** – Enabling increased Metrolink service frequency by double tracking stretches of the 91/Perris Valley Line along the Interstate (I)-215 corridor will offer riders with more convenient travel options.
- **Reduce Congestion** – The service will attract 3,500 new riders per day, helping to reduce congestion on roads and highways.
- **Strengthen Job and Education Opportunities** – the 91/Perris Valley Line offers access to local jobs at major employers such as March Air Reserve Base, UCPath, Western Municipal Water District, and commercial and retail centers. Additionally, the service is adjacent to colleges and universities, including Mt. San Jacinto College, Moreno Valley College, University of California, Riverside, and California Baptist University.

As the region's population and economy continue to grow, so does the need for expanded transportation infrastructure. Riverside County residents endure some of the longest commutes in the region. Riverside County is the 10th most populous county in the nation and has led the state in domestic migration since 2020 due to housing availability and economic opportunities. Now, Riverside County is expected to add 500,000 residents by 2048. Meanwhile, 40 percent of the nation's goods travel from the Ports of Long Beach and Los Angeles through the region to destinations across the country. Our transportation system cannot keep up, leaving families and businesses behind in traffic. The Project will go a long way to accommodate continued population, goods movement, and economic growth along the State Route 91 and Interstate 215 corridors.

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 Karen Spiegel
Chair, County of Riverside Board of Supervisors

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March 2, 2026

The Honorable Raul Ruiz
United States House of Representatives
2342 Rayburn House Office Building
Washington, D.C. 20515

Subject: Support CPF Funding for New Regional Arterial in the Communities of Hemet, San Jacinto, and Winchester

Dear Representative Ruiz:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Riverside County Transportation Commission's (RCTC) Community Project Funding (CPF) request for $5 million to fund a new regional arterial in the communities of Hemet, San Jacinto, and Winchester adjacent to State Route 79. The project aims to build a 12-mile facility with a safer, more direct route for travelers. The project advances the County of Riverside's goal of "connected communities" and RCTC's long-standing mission to provide a safe, interconnected, multimodal transportation system. Benefits of the project include:

- **Deliver critical improvements to growing region –** Communities in the San Jacinto Valley are among the fastest growing in the nation and are in need of transportation solutions to match that growth. The project would better connect travelers and residents to their destinations.
- **Support tourism and economic growth** – The project will strengthen access to and connectivity between destinations in the San Jacinto Valley, Temecula Valley, San Gorgonio Pass, and Coachella Valley. Residents and travelers alike will benefit from a more direct connection to major highways, including Interstate 215 to the west, State Route 60 to the north, and Interstate 15 to the south.
- **Advance multimodal transportation options** – The project increases travel choice by investing in transit improvements and active transportation.

As the region's population and economy continue to grow, so does the need for expanded transportation infrastructure. Riverside County residents endure some of the longest commutes in the region. Riverside County is the 10th most populous county in the nation and has led the state in domestic migration since 2020 due to housing availability and economic opportunities. Now, Riverside County is expected to add 500,000 residents by 2048. Meanwhile, 40 percent of the nation's goods travel from the Ports of Long Beach and Los Angeles through the region to destinations across the country. Our transportation system cannot keep up, leaving families and businesses behind in traffic. The project will go a long way to accommodate continued population, goods movement, and economic growth in Riverside County.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

March 2, 2026

The Honorable Alex Padilla
United States Senate
331 Hart Senate Office Building
Washington, D.C. 20510

Subject: Support CDS Funding for the Interstate 15 Express Lanes Project Southern Extension

Dear Senator Padilla:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Riverside County Transportation Commission's (RCTC) Congressionally Directed Spending (CDS) request for $3 million to fund the Interstate (I) 15 Express Lanes Project Southern Extension (Project). The Project extends the existing I-15 Express Lanes an additional 15.8 miles from El Cerrito Road in Corona to State Route 74 (Central Avenue) in Lake Elsinore. The Project will continue to advance the County of Riverside's goal of "connected communities" and RCTC's mission to provide an interconnected, multimodal transportation system in Riverside County. The Project will help:

- **Promote Safety** – Enabling passenger vehicles to travel in dedicated lanes separated from trucks, which rely upon the I-15 corridor to deliver goods from the ports.
- **Increase Travel Time Reliability and Mobility Choice** – Enhance the flow of traffic by providing a reliable travel time alternative within the corridor while encouraging carpooling and use of express bus service.
- **Expand Regional Economic Competitiveness** – Promote international and interstate commerce by enhancing mobility between major international ports.

As the region's population and economy continue to grow, so does the need for expanded transportation infrastructure. Riverside County residents endure some of the longest commutes in the region. Riverside County is the 10th most populous county in the nation and has led the state in domestic migration since 2020 due to housing availability and economic opportunities. Now, Riverside County is expected to add

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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.

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Chair, County of Riverside Board of Supervisors

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BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

March 2, 2026

The Honorable Adam Schiff
United States Senate
112 Hart Senate Office Building
Washington, D.C. 20510

Subject: Support CDS Funding for the Interstate 15 Express Lanes Project Southern Extension

Dear Senator Schiff:

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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 Karen Spiegel
Chair, County of Riverside Board of Supervisors

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

February 9, 2026

The Honorable Sean Duffy
Secretary, U.S. Department of Transportation
200 New Jersey Avenue, SE
Washington, DC 20590

Re: Support for RCTC's FY 2026 BUILD Grant for the 91 Eastbound Corridor Operations Project

Dear Secretary Duffy:

On behalf of the County of Riverside Board of Supervisors, I write to express our support of the Riverside County Transportation Commission's (RCTC) FY 2026 federal Better Utilizing Investments to Leverage Development (BUILD) grant application for the State Route (SR) 91 Eastbound Corridor Operations Project (91 ECOP). The project enhances mobility by adding an eastbound lane along three miles on SR-91 from the SR-241 Toll Road connector to the SR-71 connector in Corona. RCTC is seeking $25 million in FY 2026 BUILD grant funds to advance the project through the construction phase. The project advances RCTC's mission to provide a safe, interconnected transportation system that supports and facilitates economic growth by providing the following benefits:

- Promote Safety – Alleviating traffic merging, diverging, and weaving will promote traveler safety and improve traffic flow.
- Support and Facilitate Economic Growth – Enhancing the flow of commerce by better connecting drivers with economic, education, and job centers across the region.
- Improve Mobility – Adding a lane will reduce delays and improve travel between Riverside and Orange Counties, and reduce traffic impacts on local roads and neighborhoods.

As the region's population and economy continue to grow, the need for expanded transportation infrastructure follows. Riverside County residents endure some of the longest commutes in the region. some of the longest commute times in the region. Riverside County is the 10th most populous county in the nation and has led the state in domestic migration since 2020 due to housing availability and economic

opportunities. Riverside County is expected to add 500,000 residents by 2048. Meanwhile, 40 percent of the nation's goods travel from the Ports of Long Beach and Los Angeles through the region to destinations across the country. Our transportation system cannot keep up, leaving families and businesses behind in traffic. The Project will go a long way to accommodate continued population, goods movement, and economic growth along the SR-91 corridor.

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 Karen Spiegel
Chair, County of Riverside Board of Supervisors

CORRESPONDENCE

H.R. 1 AND STATE BUDGET ADVOCACY

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

April 15, 2026

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

The Honorable David Tangipa
Vice Chair, Assembly Committee on Budget
1021 O Street, Suite 4310
Sacramento, CA 95814

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

The Honorable Jeff Gonzalez
California State Assembly, District 36
1021 O Street, Suite 4230
Sacramento, CA 95814

The Honorable Greg Wallis
California State Assembly, District 47
1021 O Street, Suite 4330
Sacramento, CA 95814

The Honorable Leticia Castillo
California State Assembly, District 58
1021 O Street, Suite 4240
Sacramento, CA 95814

The Honorable Dr. Corey Jackson
California State Assembly, District 60
1021 O Street, Suite 6120
Sacramento, CA 95814

The Honorable Natasha Johnson
California State Assembly, District 63
1021 O Street, Suite 4520
Sacramento, CA 95814

The Honorable Kate Sanchez
California State Assembly, District 71
1021 O Street, Suite 4340
Sacramento, CA 95814

Re: 2026–27 State Budget – Mitigating Local Impacts of H.R. 1

Dear Speaker Rivas, Assemblymember Gabriel, Assemblymember Tangipa, and State Assemblymembers for the County of Riverside:

On behalf of the County of Riverside Board of Supervisors, I write to provide our perspective on the State's 2026–27 budget in light of the recently enacted House Resolution 1 (H.R. 1), the "One Big Beautiful Bill Act."

H.R. 1 represents a fundamental shift in the federal-state-county partnership for delivering safety-net services. While the policy changes are federal, the operational and fiscal consequences will be borne locally. Counties are now at the center of implementation, responsible for absorbing increased workload, responding to rising unmet needs, and maintaining continuity of care for vulnerable residents.

Without timely and sustained State investment, the impacts of H.R. 1 will materially reduce access to healthcare and food assistance in Riverside County and create fiscal pressures the County cannot absorb without affecting other core services.

Riverside County strongly supports the coordinated advocacy efforts led by the California State Association of Counties (CSAC), the Urban Counties of California (UCC), and our partner associations. We respectfully request that the State Budget include targeted, sustained investments aligned with these efforts—grounded in the real and immediate impacts being experienced at the local level.

Riverside County Impacts

The implications of H.R. 1 for Riverside County are substantial, immediate, and measurable:

- **Loss of Coverage and Increased Demand for Care**
  Approximately 300,000 Riverside County residents are at risk of losing Medi-Cal coverage, triggering a cascade of impacts across the healthcare system.

- **Health System Strain**
  The County's health system could experience:
  - 870,000 to 1.5 million fewer reimbursed visits annually
  - 18,000 to 31,000 fewer hospital bed days
  - $280 million to $456 million in lost annual Medi-Cal revenue

- **Growth in Indigent Care Demand**
  As coverage declines, the County's Medically Indigent Services Program (MISP) is expected to serve 23,000 to 62,000 additional patients annually, increasing General Fund costs by $70 million to $187 million per year.

- **CalFresh Impacts and Administrative Burden**
  More than 72,000 Riverside County residents will be subject to new work requirements, while cost shifts could result in a $30 million shortfall, placing up to 269 positions at risk and significantly increasing caseloads.

- **Systemwide Consequences**
  As coverage declines, more residents will delay care, rely on emergency departments, and present with more advanced conditions, resulting in higher costs and straining capacity across the entire local healthcare system.

These impacts are consistent with statewide projections, which estimate $6 billion to $9.5 billion in annual costs to counties once H.R. 1 is fully implemented.

State Partnership is Essential

Counties do not have the fiscal capacity to absorb these impacts alone. As UCC has noted, H.R. 1 places counties at the epicenter of implementation with limited ability to manage the resulting fiscal and operational pressures.

If the State does not act, counties will be forced to make difficult choices, reducing services, limiting access to care, and redirecting General Fund resources away from public safety, infrastructure, and other core priorities.

These impacts are not theoretical – they will occur. The issue is whether they will be managed in a way that protects residents and preserves system stability.

Riverside County Support for State Budget Investments

Consistent with CSAC, UCC, and affiliated associations, Riverside County respectfully requests that the State Budget include investments in four key areas. For us, these investments are not abstract policy choices, they directly determine whether we can sustain our health system, maintain eligibility operations, and meet our legal obligation to care for those with no other option. Each of the four investments described below is directly tied to avoiding measurable harm to residents and maintaining system stability.

1. **Indigent Care**
   State support is necessary to meet counties' legal obligation to provide care under Welfare & Institutions Code 17000.

   If funded: Counties can maintain a basic safety net for those who lose coverage.

   If not funded: Counties will absorb these costs directly, forcing reductions in other services.

   Statewide request: $761 million in 2026–27 and $2.4 billion in 2027–28

2. **Public Hospital Systems**
   Public hospital systems like Riverside University Health System (RUHS) will face substantial revenue losses due to reduced federal funding and increased uncompensated care.

   If funded: Public hospitals can maintain core services and capacity.

   If not funded: Service reductions, longer wait times, and decreased access to care become increasingly likely.

   Statewide request: $500 million in 2026–27 and $850 million in 2027–28

3. **Eligibility and Workforce Support**
   H.R. 1 introduces complex eligibility requirements that significantly increase workload for county staff and create barriers for residents attempting to maintain coverage.

   If funded: Counties can help eligible residents retain benefits and prevent unnecessary loss of coverage.

   If not funded: Eligible residents will lose benefits due to administrative barriers, increasing uninsured rates, and downstream costs.

   Statewide request: $373 million in 2026–27 and $402 million in 2027–28

4. **Behavioral Health Services**
   As individuals lose Medi-Cal coverage, demand for county behavioral health services will increase significantly.

   If funded: Counties can maintain access to mental health and substance use disorder services.

   If not funded: Unmet behavioral health needs will increase, with direct impacts on homelessness, public safety, and emergency services.

   Statewide request: $224 million in 2026–27 and $828 million in 2027–28

H.R. 1 is not a temporary disruption. It is a structural change that will reshape how safety-net services are delivered and funded in California.

Timely and sufficient State investment will determine whether California's safety net remains stable or begins to erode under these new federal pressures.

Riverside County stands ready to partner with the State, our legislative delegation, and our county colleagues to develop practical, sustainable solutions. We respectfully urge the State to act decisively to ensure that the burden of federal policy changes does not fall disproportionately on local governments or the residents who rely on these services and who we collectively serve.

Thank you for your consideration and continued partnership.

Sincerely,

Supervisor Karen Spiegel
Chair, Riverside County Board of Supervisors

Attachment

cc: Honorable Members, Assembly Budget Committee
Jason Sisney, Budget Director, Office of Assembly Speaker Robert Rivas
Katie, Kolitosos, Policy Consultant, Office of Assembly Speaker Robert Rivas
Christian Griffith, Chief Consultant, Assembly Budget Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus
Honorable Members of the Inland Empire Legislative Caucus

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

April 15, 2026

The Honorable Monique Limón
Senate President Pro Tempore
1021 O Street, Suite 8518
Sacramento, CA 95814

The Honorable Roger Niello
Vice Chair, Senate Committee on
Budget and Fiscal Review
1021 O Street, Suite 7110
Sacramento, CA 95814

The Honorable John Laird
Chair, Senate Committee on Budget
and Fiscal Review
1021 O Street, Suite 8720
Sacramento, CA 95814

The Honorable Steve Padilla
California State Senate, District 18
1021 O Street, Suite 7630
Sacramento, CA 95814

The Honorable Rosilicie Ochoa-Bogh
California State Senate, District 19
1021 O Street, Suite 7220
Sacramento, CA 95814

The Honorable Sabrina Cervantes
California State Senate, District 31
1021 O Street, Suite 7330
Sacramento, CA 95814

The Honorable Kelly Seyarto
California State Senate, District 32
1021 O Street, Suite 7120
Sacramento, CA 95814

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Dear President Pro Tempore Limón, Senator Laird, Senator Niello, and State Senators of the County of Riverside:

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Sincerely,

Supervisor Karen Spiegel
Chair, Riverside County Board of Supervisors

Attachment

cc: Honorable Members, Senate Committee on Budget and Fiscal Review
Christopher Woods, Chief Fiscal Adviser, Budget Director, Office of Senate President pro Tempore Monique Limón
Misa Lennox, Policy Director, Office of Senate President pro Tempore Monique Limón
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
Honorable Members of the Inland Empire Legislative Caucus

H.R.1 IMPACTS ON HEALTH & HOSPITAL SERVICES

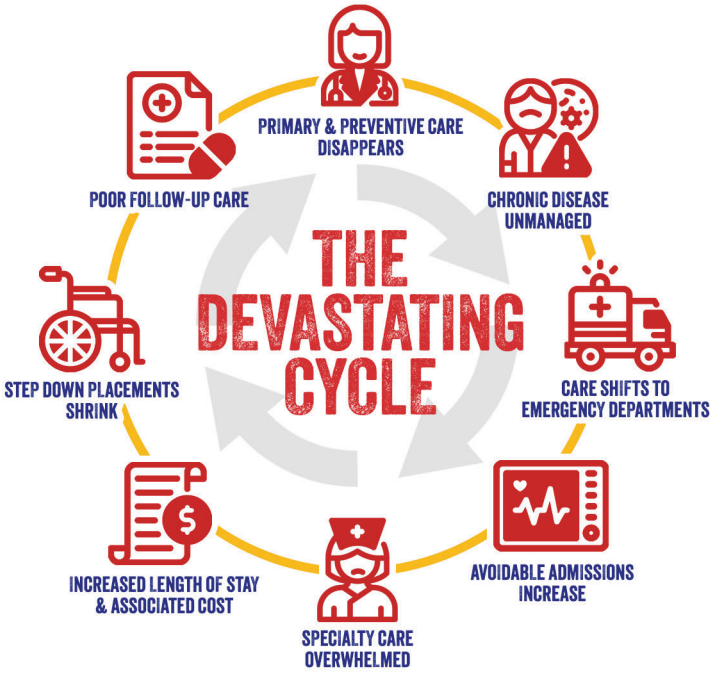
LOCAL REVENUE LOSS

100K PATIENTS LOSE MEDI-CAL

1 MILLION FEWER VISITS

25K FEWER HOSPITAL BED DAYS

$300M REVENUE LOSS



LOCAL INCREASED COSTS

62K ADDITIONAL INDIGENT PATIENTS

$150M INCREASED COSTS

= **$450M** TOTAL LOCAL IMPACT

STATEWIDE SOLUTION

STATE BUDGET REQUESTS:

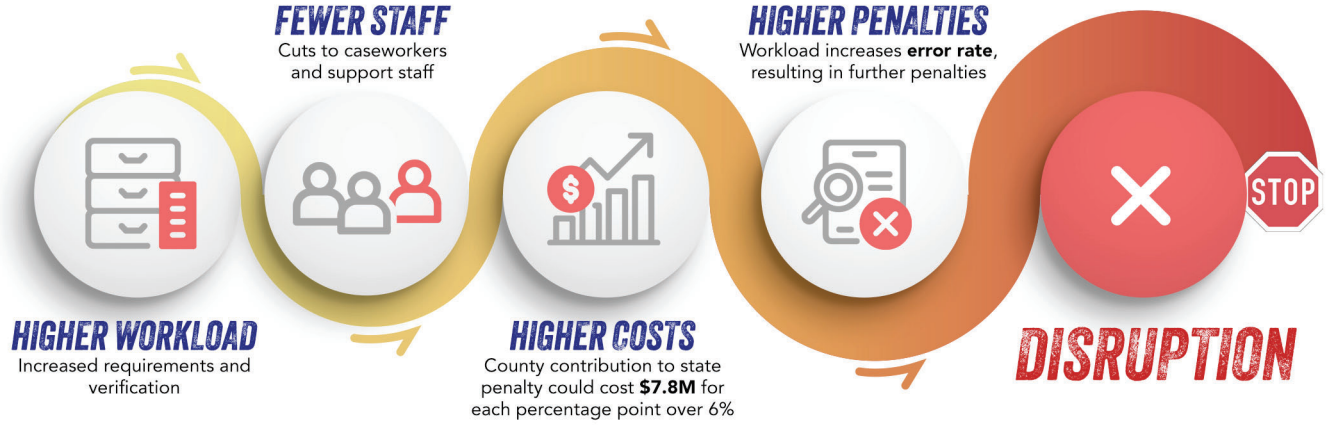
- ☑ **$761M** FOR INDIGENT CARE
- ☑ **$500M** TO SAVE PUBLIC HOSPITALS
- ☑ **$228M** FOR BEHAVIORAL HEALTH

H.R.1 IMPACTS ON CALFRESH

LOCAL WORKFORCE IMPACTS

269 EMPLOYEES LOST

120% CASELOAD INCREASE



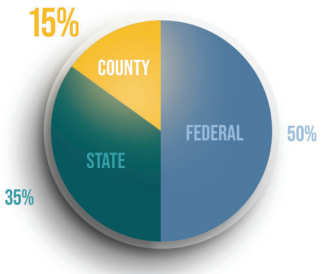
ERROR RATE PENALTIES

⚠ The Payment Error Rate (PER) measures government mistakes in issuing benefits such as calculation errors or missed updates, not fraud.

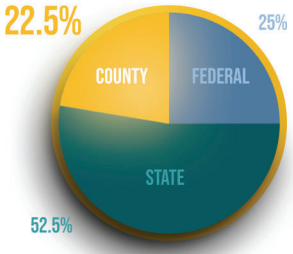
ERROR RATE	PENALTY
11%	STATE SHARE = 15%
10%	
9%	STATE SHARE = 10%
8%	
7%	STATE SHARE = 5%
6%	
5%	
4%	
3%	NO PENALTY
2%	
1%	

~11% STATE ERROR RATE
TRIGGERS 15% COST SHARE OF
$2B ANNUALLY

ADMIN COST SHIFTS



BEFORE HR 1



AFTER HR 1

STATEWIDE SOLUTION

STATE BUDGET REQUESTS:

☑ **$373M** FOR ELIGIBILITY WORKERS
ABSORB NEW WORKLOAD DEMANDS & ADMIN COSTS

☑ **CUT RED TAPE** TO ENHANCE DATA SHARING
INTEGRATED DATA SHARING & CARE COORDINATION

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

March 31, 2026

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

Re: 2026-27 State Budget:
County Veterans Services Offices (CVSOs) Funding

Members of the State Legislature:

On behalf of the Riverside County Board of Supervisors, we urge the State to make a bold and necessary investment of $30 million in ongoing statewide funding for County Veterans Services Offices (CVSOs). This is not merely a budget request, it is a commitment to ensuring that California's veterans receive the benefits, care, and dignity they have earned through their service.

Riverside County is home to one of the largest veteran communities in California, with more than 116,000 veterans and a total veteran connected population exceeding 16% of our residents. Counties like ours are on the front lines every day, helping veterans navigate increasingly complex federal systems, process claims, secure life-changing benefits, and access vital support services. Yet the State's decades old funding structure no longer meets the realities California's veterans face or the responsibilities counties carry.

Despite the State's current $11 million General Fund allocation, counties continue to shoulder most operational costs, while demand has surged due to aging veterans, new federal programs, rising mental health and housing needs, and the influx of veterans exposed to toxins and eligible under the PACT Act. Without a major reinvestment, the State risks leaving federal dollars on the table and leaving veterans behind.

California cannot afford that. The return on investment is indisputable: every dollar invested in CVSOs yields significant $52 in new federal benefits flowing directly into our communities. With $30 million in annual support, counties statewide could generate

nearly a billion dollars in new federal benefits. This is money that supports veterans' health care, housing stability, disability compensation, family support, and local economic activity.

For Riverside County alone, this funding would enable the expansion of accredited Veterans Service Representatives, reduce wait times, drastically improve claims processing outcomes, and strengthen protection for veterans vulnerable to unaccredited or predatory claims actors. Most important, it would ensure that our veterans – the individuals and families who have given so much – receive the full measure of support they deserve.

An investment of $30 million is a fraction of the State's budget, but its impact for California's veterans would be profound and immediate. We respectfully ask for your leadership in making this critical investment part of this year's State Budget. Should you have any questions regarding this letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the County of Riverside Executive Office (951) 955-1180 or csherrera@rivco.org.

Sincerely,

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members of the Inland Empire Legislative Caucus

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

March 31, 2026

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

Re: 2026-27 Proposed State Budget:
County of Riverside Impacts and Input

Members of the State Legislature:

On behalf of the County of Riverside Board of Supervisors, I would like to share the County's perspective on the proposed budget as negotiations and hearings continue to progress. Recognizing the evolving nature of federal funding, the economy, and state revenues, we acknowledge the uncertainty ahead and remain committed to working together to safeguard essential services.

The proposed January Budget included preliminary adjustments related to House Resolution (H.R.) 1, the "One Big Beautiful Bill Act" of 2025. While these early steps acknowledge the significant statewide and county level implications of H.R. 1, further collaboration will be essential to ensure its implementation strengthens, not strains, our shared systems of support. As negotiations advance and the full scope of statutory and fiscal impacts become clearer, we will return to the Legislature with additional H.R. 1 related budget requests for your review and consideration.

As counties shoulder increasing responsibilities under federal and state policy changes, stable and sufficient funding is essential to keep people housed, healthy, fed, and connected to care. These budget priorities reflect a shared commitment to prevention over crisis response, ensuring that counties can deliver the frontline services that uphold California's values and safeguard our most vulnerable communities.

Senate Subcommittee No. 3 on Health and Human Services/Assembly Subcommittee 1 on Health and Subcommittee 2 on Human Services

Program: In-Home Support Services (IHSS) Cost Shift Proposal

January Budget: The state proposed shifting $233 million in IHSS growth costs from the state to counties. This move would strain county budgets and threaten the stability of in-home care for seniors and people with disabilities.

RivCo Impact:

- Significant Fiscal Impact: The projected $16.4 million growth cost shift to Riverside County creates immediate and unsustainable pressure on local funding, reducing the County's capacity to meet rising service demands.
- Threat to Essential IHSS Services: Shifting additional IHSS costs to counties jeopardizes timely service delivery for vulnerable residents and undermines the County's ability to administer the program effectively.
- Risk to Social Services System Stability: Absorbing these new obligations within the constraints of the 1991 Realignment could force reductions in staffing and other critical Social Services functions, leading to disruptions in client support and broader operational impacts.

Program: Medi-Cal Mobile Crisis Services
January Budget: Would shift tens of millions in annual costs to counties, hampering the ability to draw down federal funds.
RivCo Impact:

- Threatens Local Progress: Shifting additional responsibilities or costs onto counties risks weakening the major strides Riverside County has made – including the 24/7 Mobile Crisis Response program, which diverts 70% of crises from law enforcement and hospitals and provides immediate, community-based care.
- Undercuts Proven County Innovations: Riverside County has expanded mobile crisis services, added new response vans, and partnered with behavioral-health organizations and public safety partners to provide anytime-anywhere support.

Program: Palo Verde Hospital Distressed Hospital Loan Forgiveness
January Budget: The proposed budget does not include loan forgiveness.
RivCo Impact:

- Prevent Rural Hospital Collapse: The District's acute financial distress, ongoing Chapter 9 related challenges, and reliance on County emergency loans demonstrate that repayment capacity is severely limited. Forgiving the loan protects the region from losing its sole hospital–an outcome that would jeopardize public safety, increase transport times, and shift costs onto surrounding counties.
- Protect Rural Federal Funding: Closure of Palo Verde Hospital would reduce the State's ability to draw down federal dollars available through rural transformation initiatives, including CMS Rural Health Transformation programs, undermining statewide efforts to stabilize rural health systems.

Senate Subcommittee No. 4 on State Administration/Assembly Subcommittee 5 on State Administration

Program: Homeless Housing, Assistance and Prevention (HHAP) Program
January Budget: The proposed budget does not include additional funding for HHAP.
RivCo Impact:

- Ongoing Funding: Counties appreciate that last year's $500 million commitment for the HHAP program in 2026–27 remains in place. We continue to urge full funding of

$1 billion for Round 7, as prior HHAP investments and strong local partnerships have demonstrated meaningful progress in reducing homelessness across California.
- Sustaining Proven Results: To maintain momentum, Round 7 dollars should be fully funded and distributed to avoid disruptions to effective local programs.

Program: Veteran Service Office Fund (VSOF)
January Budget: The proposed budget includes no additional funding.
RivCo Impact:
- Expand Capacity to Meet Rising Demand: Riverside County's VSOs face growing caseloads and increasing complexity. With the recent signing of Senate Bill 694, more veterans will turn to county-run VSOs for legitimate help. Without additional state investment, capacity constraints will delay claims and undermine the full impact of these new statewide protections designed to safeguard veterans from fraud and abuse.
- Maximize Federal and Local Impact: Every state dollar invested in County VSOs generates substantial federal returns for local communities, helping California capture its fair share of federal benefits that too often go unclaimed, while strengthening families, improving economic stability, and advancing statewide goals to support veterans and military families.

Senate Subcommittee No. 5 on Public Safety, the Judiciary, Labor and Transportation/Assembly Subcommittee 6 on Public Safety
Program: Pretrial Services
January Budget: The Governor's proposed budget reduces the program by $20 million in 2026–27 and ongoing.
RivCo Impact:
- Growing Caseloads: Pretrial monitoring caseloads have surged, yet funding has remained flat, leaving counties unable to keep pace as pretrial services become increasingly central to diversion and treatment.

Program: AB 1869 Criminal Fee Backfill Funding
January Budget: The Governor's January Budget does not extend the existing $65 million in statewide backfill funding set to expire June 30, 2026.
- Unfunded State Mandate: Eliminating criminal administrative fees removed revenue but not the county's ongoing operational and public safety responsibilities.
- Critical Program Support: Riverside County relied on $3.3 million in backfill funding in 2025, including $2,695,308 for the Coordinated Custody Management Unit (CCMU).
- Reducing Jail Capacity: The CCMU reduces overcrowding by safely diverting eligible individuals to home detention and work release, preserving limited jail beds for serious and violent offenders.

As partners in ensuring the well-being of our communities, we welcome ongoing collaboration to explore innovative solutions that safeguard essential programs and maintain the accessibility and quality of services that so many rely upon. Should you have any questions regarding this

letter, please do not hesitate to contact Carolina Herrera, Director of Legislative Advocacy & Governmental Affairs at the County of Riverside Executive Office (951) 955-1180 or csherrera@rivco.org.

Sincerely,

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members of the Inland Empire Legislative Caucus

CORRESPONDENCE

GENERAL LETTERS SENT FROM THE BOARD

Riverside County Workforce Development Board

Jamil Dada
Chairperson

Members

Adam Eventov
Alfonso Jimenez
Andrew McDuffie
Angel Sanchez, Jr.
Brooke Nunn
Caleb Ragan
Carolyn Reyna
Dr. Debra Mustain
Dr. Angelo Farooq
Greg Elgan
Jamil Dada
Jeremey Shumaker
Juan De Lara
Kevin Vaughn
Kimberly Starrs
Mary Jo Ramirez
Nohora Vazquez
Palbinder Badesha
Patrick Ellis
Ricardo Cisneros
Suzanne Holland

March 4, 2026

Honorable Darrell Issa
2108 Rayburn House Office Building
Washington, DC 20515

Re: FY 2027 Workforce Innovation and Opportunity Act Funding Request

Dear Mr. Issa:

On behalf of the Couty of Riverside Workforce Development Board, please accept this letter as a request to increase the Workforce Innovation and Opportunity Act (WIOA) Funding for the adult program, **from last year's appropriation of $875M to $1.5B**. The WIOA adult program helps adults with barriers to employment gain new skills and find in-demand jobs in growth sectors. Services funded under WIOA include case management, skills assessments, career technical training, tailored supportive services (childcare and transportation), job placement and business expansion. This program is the main mechanism in assisting low-income households access pathways to self-sufficiency and career advancement.

Issue: Since 2015 the funding for WIOA has been relatively flat despite increasing demand. To further the demand, H.R. 1 created two major new work requirement mandates that expand the workforce population this system must serve, without providing additional WIOA funding. It is estimated that **8.8 million individuals will be subjected to the new SNAP work requirements**, and **18.5 million new Medicaid enrollees will be affected**. Locally, within your congressional district it is estimated that **67,041 residents will be impacted under the new work requirements**.

The current workforce system cannot absorb this demand and will require an increase in investment. Therefore, we respectfully urge you to support increasing FY 2027 funding for the WIOA adult program to $1.5 billion. We appreciate your support and continued leadership around workforce development. Should you have any questions or wish to discuss further, please contact Stephanie Adams, Deputy Director of Riverside County Workforce Development, via email at sjadams@rivco.org or telephone at (951) 295-5087.

Sincerely,

Jamil Dada, Chairman
Riverside County Workforce Development Board

Riverside County Workforce Development Board

Jamil Dada
Chairperson

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Patrick Ellis
Ricardo Cisneros
Suzanne Holland

March 4, 2026

Honorable Raul Ruiz
2342 Rayburn HOB
Washington, DC 20515

Re: FY 2027 Workforce Innovation and Opportunity Act Funding Request

Dear Mr. Ruiz:

On behalf of the Couty of Riverside Workforce Development Board, please accept this letter as a request to increase the Workforce Innovation and Opportunity Act (WIOA) Funding for the adult program, **from last year's appropriation of $875M to $1.5B**. The WIOA adult program helps adults with barriers to employment gain new skills and find in-demand jobs in growth sectors. Services funded under WIOA include case management, skills assessments, career technical training, tailored supportive services (childcare and transportation), job placement and business expansion. This program is the main mechanism in assisting low-income households access pathways to self-sufficiency and career advancement.

Issue: Since 2015 the funding for WIOA has been relatively flat despite increasing demand. To further the demand, H.R. 1 created two major new work requirement mandates that expand the workforce population this system must serve, without providing additional WIOA funding. It is estimated that **8.8 million individuals will be subjected to the new SNAP work requirements**, and **18.5 million new Medicaid enrollees will be affected**. Locally, within your congressional district it is estimated that **116,914 residents will be impacted under the new work requirements**.

The current workforce system cannot absorb this demand and will require an increase in investment. Therefore, we respectfully urge you to support increasing FY 2027 funding for the WIOA adult program to $1.5 billion. We appreciate your support and continued leadership around workforce development. Should you have any questions or wish to discuss further, please contact Stephanie Adams, Deputy Director of Riverside County Workforce Development, via email at sjadams@rivco.org or telephone at (951) 295-5087.

Sincerely,

Jamil Dada, Chairman
Riverside County Workforce Development Board

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Nohora Vazquez
Palbinder Badesha
Patrick Ellis
Ricardo Cisneros
Suzanne Holland

March 4, 2026

Honorable Mark Takano
2078 Rayburn HOB
Washington, DC 20515

Re: FY 2027 Workforce Innovation and Opportunity Act Funding Request

Dear Mr. Takano:

On behalf of the Couty of Riverside Workforce Development Board, please accept this letter as a request to increase the Workforce Innovation and Opportunity Act (WIOA) Funding for the adult program, **from last year's appropriation of $875M to $1.5B**. The WIOA adult program helps adults with barriers to employment gain new skills and find in-demand jobs in growth sectors. Services funded under WIOA include case management, skills assessments, career technical training, tailored supportive services (childcare and transportation), job placement and business expansion. This program is the main mechanism in assisting low-income households access pathways to self-sufficiency and career advancement.

Issue: Since 2015 the funding for WIOA has been relatively flat despite increasing demand. To further the demand, H.R. 1 created two major new work requirement mandates that expand the workforce population this system must serve, without providing additional WIOA funding. It is estimated that **8.8 million individuals will be subjected to the new SNAP work requirements**, and **18.5 million new Medicaid enrollees will be affected**. Locally, within your congressional district it is estimated that **79,893 residents will be impacted under the new work requirements**.

The current workforce system cannot absorb this demand and will require an increase in investment. Therefore, we respectfully urge you to support increasing FY 2027 funding for the WIOA adult program to $1.5 billion. We appreciate your support and continued leadership around workforce development. Should you have any questions or wish to discuss further, please contact Stephanie Adams, Deputy Director of Riverside County Workforce Development, via email at sjadams@rivco.org or telephone at (951) 295-5087.

Sincerely,

Jamil Dada, Chairman
Riverside County Workforce Development Board

CALIFORNIA
2026 County of Riverside Official Bill List

2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
A.B.35: Safe Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024: Administrative Procedure Act: exemption: program guidelines and selection criteria.	CA Assemb. David Alvarez (D-CA-080)	Assembly Bill No. 35 amends Section 90135 of the California Public Resources Code to expedite the implementation of the Safe Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024, which was approved by voters as Proposition 4 and authorizes $10 billion in general obligation bonds for a range of environmental resilience projects. The bill exempts the adoption of regulations necessary to implement programs funded by this bond act from the requirements of the Administrative Procedure Act (APA), allowing state agencies to bypass standard regulatory procedures and instead follow a streamlined process. State entities administering competitive grant programs under this exemption must develop draft project solicitation and evaluation guidelines, publish them for at least 30 days of public comment, offer tribal consultation, respond to public comments, and submit finalized guidelines to the Secretary of the Natural Resources Agency for verification and public posting, except for the State Water Resources Control Board, which is exempt from this submission requirement. The bill also allows the continued use of previously developed guidelines that meet the divisionâ€™s requirements. Additionally, the bill maintains requirements for annual public reporting of project expenditures, independent audits, and proportional funding of oversight activities from bond proceeds. The urgency clause declares the billâ€™s immediate effect is necessary to address heightened risks from climate change, such as wildfires, drought, and threats to safe drinking water, and to ensure prompt distribution of funds in line with voter intent. The changes align with the organizationâ€™s mission to promote environmental protection, climate resilience, and equitable access to resources by facilitating faster deployment of critical funding and increasing transparency and accountability in program administration.	In Senate. Read first time. To Committee on Rules for assignment.	Support	Support	Support	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB35
A.B.53: Personal income taxes: exclusion: Military Services Retirement and Surviving Spouse Benefit Payment Act.	CA Assemb. James Ramos (D-CA-045), CA Assemb. Blanca Pacheco (D-CA-064), CA Assemb. Darshana Patel (D-CA-076), CA Assemb. Tina McKinnor (D-CA-061)	The legislative text introduces amendments to the Revenue and Taxation Code, specifically adding Sections 17132.9 and 17132.10, which provide tax exclusions for certain income received by qualified taxpayers. For taxable years beginning on or after January 1, 2025, and before January 1, 2030, the bill excludes from gross income up to $20,000 of retirement pay received by qualified taxpayers from the federal government for service in the uniformed services. Similarly, it excludes up to $20,000 of annuity payments received by qualified taxpayers under the United States Department of Defense Survivor Benefit Plan. The bill defines a "qualified taxpayer" as an individual whose adjusted gross income does not exceed $125,000, or $250,000 for surviving spouses filing jointly. The legislation aims to honor the service of military personnel and provide financial relief to their families, encouraging them to remain in or retire in California. It also seeks to increase the number of highly skilled veterans in the state's workforce. The bill mandates the collection of data to assess the effectiveness of these exclusions, with a report due by December 1, 2037. The act is designed to take effect immediately as a tax levy and does not require reimbursement for local agencies or school districts, as it does not impose new costs on them.	Referred to Coms. on Committee on Revenue and Taxation. and M. & V.A.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB53

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A.B.72: Electric Vehicle Economic Opportunity Zone: County of Riverside.	CA Assemb. Corey Jackson (D-CA-060)	Assembly Bill 72, as amended, proposes the establishment of an Electric Vehicle Economic Opportunity Zone (EVEOZ) specifically for the County of Riverside, California. The bill is designed to support the state's transition to zero-emission vehicles, as mandated by Executive Order No. N-79-20, by ensuring that lower-income communities benefit from the economic opportunities associated with the electric vehicle (EV) industry. The EVEOZ would be administered by the Labor and Workforce Development Agency, which is tasked with collaborating with Riverside County to determine the zone's geographical boundaries. The agency is authorized to partner with educational institutions, EV manufacturing businesses, and financial institutions to develop a range of education, training, and investment programs. These programs may include accredited collegiate degrees in EV manufacturing and engineering, battery manufacturing, certification and apprenticeship programs, and training for EV service technicians and charging station installation. Investment programs may offer business loans, tax credits, grants, and hiring incentives to support the development and operation of EV manufacturing facilities within the zone, with a focus on recruiting and enrolling individuals of underprivileged economic status residing in the area. The bill also includes provisions for state reimbursement to local agencies and school districts for any costs mandated by the state as a result of this legislation. Notably, the bill replaces earlier language related to election materials in Bengali, focusing instead on workforce and economic development in the EV sector. The legislation is presented as a special statute for Riverside County, with the intent to serve as a model for similar initiatives statewide, aligning with broader state goals for clean energy job creation and equitable economic development.	In Senate. Read first time. To Committee on Rules for assignment.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB72
A.B.690: Criminal procedure: indigent defense compensation.	CA Assemb. Nicholas "Nick" Schultz (D-CA-044)	Assembly Bill 690, as amended, revises California's procedures and standards for contracting indigent defense services in criminal cases. Effective for contracts entered into after January 1, 2027, the bill requires counties and courts to ensure that all contracts or agreements for indigent defense comply with the California Standards for Contract and Panel Defense Systems as set by the Office of the State Public Defender. The bill prohibits the use of flat fee or per-case compensation contracts, mandating instead that contracts provide for hourly rates or their equivalents, and that attorneys are given sufficient resources and time to provide competent legal representation. Contracts must also include separate allocations for ancillary defense services such as investigators, social workers, and immigration counsel, and must allow for contract modifications if caseloads or costs exceed initial estimates. Counties contracting with private entities or law firms must submit all such contracts to the Office of the State Public Defender every two years. The bill amends Section 987.2 and adds Section 987.7 to the Penal Code, establishing new requirements for contract structure, reporting, and compliance, and aims to eliminate financial conflicts of interest that can undermine effective legal representation for indigent defendants. The legislation is intended to ensure fair compensation for defense attorneys, promote vigorous representation, and uphold the constitutional right to effective counsel regardless of a defendant's financial status or location.	In committee: Held under submission.	Oppose	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB690

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A.B.691: Personal Income Tax Law: credits: pet adoption and medical expenses.	CA Assemb. Greg Wallis (R-CA-047)	The legislative text introduces a new provision to the California Revenue and Taxation Code, allowing personal income tax credits for pet adoption and medical expenses. Specifically, for taxable years from January 1, 2025, to January 1, 2030, taxpayers can claim a credit of up to $250 for qualified pet adoption costs and up to $500 for qualified pet medical expenses. These credits are limited to one qualified pet per taxpayer's lifetime, with the same restrictions applying separately to each spouse in the case of joint returns. The legislation mandates taxpayers to provide necessary documentation to the Franchise Tax Board, including a declaration under penalty of perjury that the credit has not been previously claimed. The bill aims to encourage pet adoption from rescue organizations, with performance indicators including the number of taxpayers claiming the credit and the total dollar value of credits allowed. The Franchise Tax Board is required to report annually to the legislature on these metrics starting December 1, 2026. The act is effective immediately as a tax levy and does not require reimbursement to local agencies or school districts, as it pertains to changes in crime definitions or penalties.	From committee: Without further action pursuant to Joint Rule 62(a).	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB691
A.B.735: Planning and zoning: logistics use developments: truck routes.	CA Assemb. Juan Carrillo (D-CA-039)	Assembly Bill 735, as amended in the 2025â€“26 California legislative session, establishes comprehensive statewide standards and regulations for the development, expansion, and operation of logistics use developments, particularly warehouses, with a focus on minimizing environmental and community impacts. The bill clarifies and updates definitions, such as 'logistics use development,' and mandates that new or expanded logistics facilities comply with the most current building and energy efficiency standards at the time of permitting. These standards include requirements for photovoltaic systems, cool roofing, electric vehicle charging infrastructure, high-efficiency HVAC systems, and the use of zero-emission equipment where feasible. The legislation also sets forth specific design and siting requirements, such as minimum distances between loading bays and sensitive receptors (e.g., residences, schools, hospitals), mandatory buffer zones with landscaping and screening, and separate truck entrances accessible via designated commercial or industrial roadways. The bill requires local jurisdictions to adopt ordinances by January 1, 2028 (or January 1, 2030 for smaller jurisdictions), establishing truck routes that prioritize the use of highways and arterial roads while avoiding residential areas and sensitive receptors. These ordinances must include public participation processes, signage requirements, and the publication of truck routes in GIS format. In warehouse concentration regions, such as parts of Riverside and San Bernardino counties, circulation elements must be updated by January 1, 2026, to reflect these routing and siting priorities. The Attorney General is authorized to enforce compliance, with penalties of up to $50,000 every six months for violations, and collected penalties are to be returned to local air quality management districts for air quality improvement efforts. The bill modifies existing law to ensure that logistics use developments do not displace housing without adequate replacement. Specifically, it requires a two-to-one replacement of any demolished housing unit occupied within the last ten years (unless previously declared substandard), with new affordable units built within the same jurisdiction. Displaced tenants are entitled to compensation equivalent to twelve monthsâ€™ rent. The bill also clarifies that these requirements do not preclude compliance with other state housing protection statutes, such as those prohibiting the demolition of	Ordered to inactive file at the request of Senator Reyes.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB735

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A.B.793: Potentially dangerous and vicious dogs: designation and disposition: burden of proof.	CA Assemb. Nicholas "Nick" Schultz (D-CA-044)	Assembly Bill 793 amends California's Food and Agricultural Code to revise the procedures and standards for designating and regulating potentially dangerous and vicious dogs. The bill raises the evidentiary standard for declaring a dog 'vicious' from a preponderance of the evidence to clear and convincing evidence, and requires courts or hearing entities to make specific factual findings, including whether the dog was provoked, before such a designation. The bill defines 'provoke' and clarifies that provocation must be considered in all proceedings, potentially exempting dogs from regulation or euthanasia if their actions were provoked. Orders to euthanize a dog for public health, safety, and welfare reasons must be supported by clear and convincing evidence and detailed findings, and cannot be carried out until all appeals are exhausted. The bill also prohibits dogs from being declared dangerous or vicious if the injury occurred while the dog was provoked, defending itself, or protecting a person from an unjustified attack. Local programs regulating dangerous dogs must comply with these new standards, including the higher burden of proof and due process requirements, and cannot be breed-specific. The legislation clarifies that these provisions apply only to governmental or judicial proceedings, not to civil actions for damages. The bill asserts statewide concern over the uniform treatment and due process for dogs facing potential euthanasia, applying its requirements to all California jurisdictions.	In committee: Held under submission.	Oppose Unless Amended		Oppose Unless Amended	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB793
A.B.826: Deceptive practices: service members and veterans.	CA Assemb. Jeff Gonzalez (R-CA-036)	Assembly Bill 826, as amended in the 2025â€“26 California legislative session, modifies Section 1770 of the Civil Code, which is part of the Consumers Legal Remedies Act. The bill expands the definition of unlawful unfair or deceptive acts and practices in consumer transactions, with a particular focus on protecting service members and veterans from misleading advertising and deceptive business practices. Specifically, the bill requires that any advertising or promotion of services or events related to veteransâ€™ benefits or entitlements must include clear, standardized disclosures if the advertiser is not authorized to file veteransâ€™ benefit claims or is not affiliated with official veteransâ€™ organizations. These disclosures must be presented in the same type size and font as the term â€œveteranâ€ and must be delivered both orally and in writing at the beginning of any such service or event. The bill also clarifies that these requirements do not apply to accredited agents or attorneys or to events with written permission from official veteransâ€™ organizations. Additionally, the bill maintains and clarifies prohibitions against charging unreasonable fees for assisting with public social services, including those administered by the Department of Veterans Affairs, and outlines factors for determining fee reasonableness. The legislation further addresses a range of consumer protection issues, such as misrepresentation of goods and services, misleading advertising, and mandatory fee disclosures, but the amendments most relevant to the organization's mission are those that enhance protections for veterans and service members against deceptive practices. The bill does not introduce new funding allocations or appropriations, nor does it set new deadlines, but it does specify that certain disclosure requirements become operative on July 1, 2025. Overall, AB 826 strengthens consumer protections for veterans and service members by mandating transparency in advertising and limiting exploitative practices related to veteransâ€™ benefits.	From committee: Filed with the Chief Clerk pursuant to Joint Rule 56.	Watch-High Priority			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB826

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A.B.871: Mandated reporters of suspected financial abuse of an elder or dependent adult.	CA Assemb. Catherine Stefani (D-CA-019)	Assembly Bill 871 amends Section 15630.1 of the California Welfare and Institutions Code to strengthen the reporting requirements for mandated reporters of suspected financial abuse of elders and dependent adults. The bill expands the definition of mandated reporters to include all officers and employees of financial institutions and clarifies that reports of suspected financial abuse must be made immediately, or as soon as practicably possible, by telephone or through a confidential internet reporting tool. If the initial report is made by telephone, a written or internet report must follow within two working days to the local adult protective services agency or law enforcement. The bill introduces a new requirement that, in addition to local reporting, mandated reporters must also file a report with the Federal Bureau of Investigation Internet Crime Complaint Center within two working days. However, violations of this federal reporting requirement are not subject to the civil penalties that apply to failures in local reporting. The legislation also mandates that financial institutions provide annual training to their mandated reporters on how to escalate and report suspected financial abuse both internally and to local and federal authorities, including the FBI Internet Crime Complaint Center and the Federal Trade Commission. If suspected financial abuse is discovered within 48 hours of a transaction, the financial institution must share information on reporting mechanisms, including federal options, with the impacted elder or dependent adult within 24 to 48 hours. Notably, failure to comply with this client notification requirement does not incur civil penalties. The bill maintains existing civil penalties for failure to report suspected financial abuse to local authorities, with fines up to $1,000 for non-willful violations and up to $5,000 for willful violations, enforceable only by the Attorney General, district attorney, or county counsel. It also preserves protections for mandated reporters under Civil Code Section 47(b) and authorizes them to refuse to honor a power of attorney if they have reported suspected abuse by the attorney-in-fact, while ensuring the power of attorney remains valid for other agents not implicated in a report. Key points of the bill include the addition of federal reporting requirements, enhanced training	In Senate. Read first time. To Committee on Rules for assignment.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB871
A.B.882: Electronic court reporting.	CA Assemb. Diane Papan (D-CA-021)	Assembly Bill 882, as amended, authorizes California superior courts, until January 1, 2028, to use electronic recording technology to create verbatim records of civil proceedings when a litigant who cannot afford a private court reporter requests such a record and the court, after due diligence, is unable to hire or retain sufficient official reporters or pro tempore reporters. The bill specifies that a litigant is considered unable to afford a private reporter if they have a court fee waiver, are represented by a nonprofit legal aid organization, or otherwise demonstrate financial inability. Electronic recording is not permitted in juvenile, civil commitment, or most criminal proceedings, except as already allowed by existing law. The bill requires courts to publicly announce openings for court reporter positions, conduct outreach, and maintain records of recruitment and hiring efforts. Courts must offer employment to all qualified certified shorthand reporters unless there is a reasonable basis for rejection, and must avoid unreasonable hiring barriers. The bill establishes a grievance and binding arbitration process for disputes regarding compliance, and mandates that transcripts from electronic recordings clearly indicate inaudible or unintelligible portions. The Judicial Council is tasked with developing official forms and requiring trial courts to report quarterly on recruitment and hiring data, which must be published online. These provisions are designed to ensure access to verbatim records for low-income civil litigants while maintaining transparency and accountability in court reporter hiring practices.	From committee chair, with author's amendments: Amend, and re-refer to committee. Read second time, amended, and re-referred to Committee on Judiciary	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB882

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2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
A.B.1016: Power facility and site certifications: thermal powerplants: geothermal resources.	CA Assemb. Jeff Gonzalez (R-CA-036)	Assembly Bill 1016 amends the California Public Resources Code to temporarily expand the authority of the State Energy Resources Conservation and Development Commission (CEC) to exempt certain geothermal thermal powerplants from the state's standard certification process. Specifically, until January 1, 2030, the CEC may exempt geothermal powerplants with a net generating capacity of 50 to 150 megawatts, or plans for multiple geothermal plants sharing infrastructure with a combined capacity of 50 megawatts or more, provided several criteria are met. These include timely application to the relevant local government agency, the local agency acting as the lead for environmental review under CEQA, compliance with skilled and trained workforce requirements, and no history of significant adverse impacts from prior exempted projects. The bill shifts lead agency status for CEQA review from the CEC to local governments for these projects, and mandates that all construction and maintenance work on exempted facilities use a skilled and trained workforce, with detailed compliance reporting and civil penalties for violations. The bill also clarifies definitions and exceptions related to workforce requirements and maintains that these provisions sunset on January 1, 2030. The changes align with Californiaâ€™s goals to streamline renewable energy development, ensure local oversight, and promote high labor standards in geothermal energy projects.	In committee: Set, first hearing. Hearing canceled at the request of author.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1016
A.B.1031: Hazardous waste control laws: exemption: geothermal resources.	CA Assemb. Jeff Gonzalez (R-CA-036)	Assembly Bill No. 1031, introduced by Assembly Member Jeff Gonzalez, proposes amendments to the Health and Safety Code concerning hazardous waste control laws, specifically focusing on geothermal resources. The bill seeks to 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, effective January 1, 2026. This is a significant reduction from the existing fee rate of $49.25 per ton for hazardous waste generated in 2021. The bill also aims to expand the scope of the geothermal waste exemption by removing certain limitations, although these deletions are not explicitly detailed in the provided text. The legislation aligns with the mission of regulating hazardous waste management while providing financial relief for geothermal energy producers by reducing associated fees. The bill does not require an appropriation and is subject to a majority vote, with no state-mandated local program implications.	From committee: Filed with the Chief Clerk pursuant to Joint Rule 56.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1031
A.B.1112: Tax Equity Allocation.	CA Assemb. Greg Wallis (R-CA-047)	Assembly Bill 1112, introduced by Assembly Member Wallis, proposes amendments to Section 98 of the Revenue and Taxation Code concerning property taxation and the Tax Equity Allocation (TEA) formula. The bill aims to modify the allocation of property tax revenues by removing certain reductions previously applied to qualifying cities, specifically excluding property tax revenues exchanged between the City of Rancho Mirage and a community services district from these reductions. This change would alter the distribution of ad valorem property tax revenues among local agencies within a county, necessitating a two-thirds legislative approval. The bill also outlines the responsibilities of county auditors in calculating and distributing these revenues, including the potential for reimbursement of state-mandated costs to local agencies and school districts. Additionally, the bill specifies that no reductions in allocations should occur due to services for revenue agreements or certain other conditions, and it ensures that qualifying cities receive at least the amount they would have without the TEA formula application. The bill's provisions would apply to fiscal years starting from 2006-07 and include specific guidelines for the County of Santa Clara regarding Educational Revenue Augmentation Fund (ERAF) reimbursements.	Ordered to inactive file at the request of Senator Ochoa Bogh.	Watch-High Priority			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1112

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A.B.1145: State highways: safety: State Highway Route 74: report.	CA Assemb. Greg Wallis (R-CA-047), CA Assemb. Jeff Gonzalez (R-CA-036)	Assembly Bill 1145 requires the California Department of Transportation to conduct a comprehensive study on highway safety, with a particular focus on State Highway Route 74, by December 31, 2027. The study must gather and analyze ten years of data on accidents, injuries, fatalities, 911 calls related to tire blowouts, incidents involving truck tractors, citations for Vehicle Code violations (including weight-limit violations), and accidents caused by brake failure. Additionally, the study must examine the use of transportation corridors to bypass enforcement facilities, the resulting hazards and poor road conditions, and identify high-risk areas along these corridors. Based on the findings, the department is tasked with developing recommendations to improve safety on State Highway Route 74, including strategies to address enforcement facility bypassing on other roadways, such as increased enforcement and road maintenance projects. The department must submit its findings and recommendations to the Legislature by the specified deadline. The provisions of this bill will be repealed on January 1, 2029. The bill does not allocate specific funding or create a state-mandated local program, but it does amend the Streets and Highways Code by adding and later repealing Section 98.	In committee: Set, first hearing. Hearing canceled at the request of author.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1145
A.B.1313: Water quality: permits.	CA Assemb. Diane Papan (D-CA-021)	Assembly Bill 1313, as amended, directs the California State Water Resources Control Board to establish a statewide National Pollutant Discharge Elimination System (NPDES) order for commercial, industrial, and institutional properties with five acres or more of impervious surface. This order, mandated under the federal Clean Water Act and relevant federal regulations, is to be developed after the Board makes specific findings regarding residual designation authority. The bill requires the Board to publish a draft of the statewide order for public comment by December 31, 2028, or within 18 months after the reissuance of a specified general permit, whichever is later. Concurrently, the Board must establish rules for offsite compliance agreements, detailing how permittees and local municipalities can collaborate on offsite stormwater capture and use. The NPDES order must provide multiple compliance options, including incentives for green infrastructure and both onsite and offsite stormwater management, to help dischargers meet water quality-based effluent limitations. The bill also stipulates that regulated permittees will not be subject to more than one stormwater NPDES order for the same facility, and all relevant effluent limitations for industrial activities must be incorporated into the new statewide order. These measures are in response to findings that stormwater runoff from large impervious surfaces is a significant source of water pollution, particularly heavy metals and nutrients, and that such discharges contribute to violations of water quality standards.	Died on inactive file.	Oppose Unless Amended		Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1313

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A.B.1331: Workplace surveillance.	CA Assemb. Sade Elhawary (D-CA-057)	Assembly Bill No. 1331, as amended in the 2025â€“26 California legislative session, establishes new regulations governing the use of workplace surveillance tools by employers in California. The bill defines 'workplace surveillance tools' broadly to include systems, applications, or devices that collect or facilitate the collection of worker activities, communications, biometrics, or behaviors, excluding smoke/carbon monoxide detectors and weapon detection systems. The legislation prohibits employers from monitoring or surveilling workers in specific employee-only, employer-designated areas such as bathrooms, locker rooms, changing areas, and lactation spaces, unless directed by a court order. Workers are granted the right to leave behind surveillance tools in these areas, as well as in breakrooms, cafeterias, and public bathrooms, and during off-duty hours, with exceptions for situations where workers must remain available or use such tools for job-related communication. Employers are also prohibited from requiring workers to implant surveillance devices in their bodies. The bill introduces several requirements for transparency and worker notification. If surveillance tools are used in employee-only breakrooms or cafeterias, employers must post signage indicating surveillance is occurring, and such surveillance cannot record audio or use generative artificial intelligence for monitoring. However, AI-enabled photo or video correction tools without monitoring capacity are permitted. Employers may use surveillance tools in other workplace areas if workers are notified in advance. On multiemployer worksites, the controlling employer must post a general notice describing the types of surveillance and their purposes. The bill also clarifies that employers are not in violation if workers voluntarily keep or use surveillance tools in restricted areas for access or safety, provided the tools do not record audio or use AI, and that workers are prohibited from tampering with employer-owned surveillance equipment. Enforcement provisions include a civil penalty of $500 per violation, with the Labor Commissioner and public prosecutors authorized to investigate and enforce compliance, including issuing citations and seeking temporary relief. The bill prohibits employers from retaliating against employees for exercising their rights under this law, filing complaints, or participating in investigations. The legislation does not preempt local laws that provide equal or greater protections, nor does it limit the	Ordered to inactive file at the request of Senator LimÃ³n.	Oppose	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1331

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A.B.1337: Information Practices Act of 1977.	CA Assemb. Chris Ward (D-CA-078)	Assembly Bill 1337 proposes significant amendments to the Information Practices Act of 1977, primarily by expanding its scope to include local agencies, which were previously exempt. The bill broadens the definition of 'personal information' to encompass a wider range of data types, such as biometric, genetic, neural, geolocation, and digital identifiers, and clarifies that personal information can exist in various physical and digital formats. The legislation strengthens privacy protections by restricting agencies from using personal information for purposes other than those for which it was collected, unless specifically authorized by law. It revises the rules for disclosure of personal information, specifying new and updated circumstances under which such information may be shared, and requires agencies to maintain detailed records of disclosures. The bill also mandates that agencies provide clear and timely notification to individuals in the event of a data breach, with specific content and formatting requirements for such notices. Notably, the bill lowers the threshold for disciplinary action against agency employees to include negligent, not just intentional, violations of the Act, and removes the requirement that wrongful disclosure of sensitive medical information must result in economic loss or personal injury to be punishable as a misdemeanor. The legislation includes provisions for state reimbursement to local agencies for certain mandated costs, except where the bill creates or changes crimes or penalties. The bill is aligned with the mission of organizations focused on privacy, data protection, and government accountability, as it modernizes privacy standards, increases transparency, and extends protections to a broader set of public entities and individuals.	In committee: Set, first hearing. Failed passage. Reconsideration granted.	Oppose	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1337
A.B.1358: Santa Ana River Conservancy Program: lower Santa Ana River region.	CA Assemb. Avelino Valencia (D-CA-068)	The legislative text amends sections of the Public Resources Code concerning the Santa Ana River Conservancy Program, specifically focusing on the Lower Santa Ana River Region. The primary objective of the amendments is to ensure that at least 60% of the funds allocated for projects related to site improvements, facility upgrades, and new constructions for outdoor recreation, public access, nature appreciation, and cultural preservation are directed towards heavily urbanized areas within the Lower Santa Ana River Region. These projects aim to benefit disadvantaged communities, severely disadvantaged communities, or vulnerable populations. The bill defines key terms such as "disadvantaged community," "severely disadvantaged community," and "vulnerable population" to guide the allocation of resources. Additionally, the legislation modifies existing statutes by specifying the geographic scope of the Lower Santa Ana River Region and detailing the conservancy's powers, including acquiring real property, managing program lands, and collecting fees for land use. The conservancy is also empowered to apply for and accept various forms of financial assistance to support its initiatives. The bill mandates a 30-day notice to local jurisdictions before undertaking projects or acquiring property, unless a shorter notice period is agreed upon. The amendments do not introduce new appropriations but require fiscal oversight, as indicated by the fiscal committee's involvement.	From committee: Filed with the Chief Clerk pursuant to Joint Rule 56.	Oppose			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1358

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A.B.1607: Emergency medical services.	CA Assemb. Mark Gonzalez (D-CA-054)	Assembly Bill 1607 amends existing California law regarding the Maddy Emergency Medical Services (EMS) Fund, which supports emergency medical services at the county level. The bill extends the operative date for several key provisions from January 1, 2027, to January 1, 2037. These provisions include the authority for county boards of supervisors to levy an additional penalty of $2 for every $10 on fines, penalties, and forfeitures collected for criminal offenses, with the resulting funds deposited into the EMS Fund. The bill maintains the requirement that 15% of these funds be allocated specifically to support pediatric trauma centers and improve access to pediatric trauma and emergency services, with a preference for hospitals and providers specializing in children's care. The legislation also continues to allow up to 10% of the funds to be used for administrative costs, and permits counties to maintain certain reserves within the fund. The allocation formula for the EMS Fund remains unchanged, distributing 58% to physicians and surgeons, 25% to hospitals providing disproportionate trauma and emergency care, and 17% for other emergency medical services as determined by each county. The bill does not introduce new funding amounts but extends the timeline for these existing funding mechanisms and requirements, ensuring continued support for emergency and pediatric trauma services for an additional ten years. These changes align with the mission of organizations focused on improving emergency medical care access, particularly for vulnerable pediatric populations, by securing ongoing financial support and program stability.	In Senate. Read first time. To Committee on Rules for assignment.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1607
A.B.1821: California Public Records Act: agency response time.	CA Assemb. Blanca Pacheco (D-CA-064)	Assembly Bill 1821 proposes amendments to the California Public Records Act, specifically modifying Section 7922.535 of the Government Code. The bill changes the required response time for state and local agencies to determine whether a public records request seeks disclosable records from 10 calendar days to 10 business days. Additionally, it allows agencies to extend this response period by up to 14 business days, rather than 14 calendar days, under specified 'unusual circumstances,' such as the need to search for voluminous records, consult with other agencies, or address issues arising from cyberattacks or states of emergency. The bill clarifies that these extensions are only permissible to the extent reasonably necessary and outlines specific scenarios where extensions may apply, including the inability to access electronic records due to cyberattacks or staffing shortages during a state of emergency. The legislation includes findings that these changes are intended to balance the public's right to timely access public records with the operational needs and resource constraints of public agencies. While earlier versions of the bill considered imposing additional administrative fees for requests requiring extensive search time, with exemptions for journalists and certain institutions, these provisions do not appear in the final amended text. The bill does not introduce new funding allocations or appropriations, nor does it create a state-mandated local program. The amendments are presented as furthering the constitutional right of public access while acknowledging the practical challenges faced by agencies in fulfilling complex or voluminous records requests.	From committee: Do pass. (Ayes 11. Noes 2.) (April 22).	Support		Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1821

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A.B.1855: California Environmental Quality Act: exemption: passenger rail service.	CA Assemb. Jeff Gonzalez (R-CA-036)	Assembly Bill 1855 proposes amendments to Section 21080.25 of the California Public Resources Code, which governs exemptions from the California Environmental Quality Act (CEQA) for certain transportation projects. The bill notably expands the scope of CEQA exemptions for passenger rail service projects. Under current law, only projects exclusively using zero-emission trains or certified Tier 4 or cleaner locomotives are eligible for exemption, and the entire project must be within an existing rail or highway right-of-way. AB 1855 removes the requirement that projects be exclusively used by zero-emission or Tier 4 rolling stock, allowing a broader range of passenger rail projects to qualify for exemption. Additionally, the bill narrows the location requirement so that only the mainline rail, rather than the entire project, must be within an existing right-of-way. The bill also modifies restrictions for projects in air basins with serious, severe, or extreme nonattainment for particulate matter and ozone. Previously, projects using non-zero-emission Tier 4 or cleaner locomotives in these areas were ineligible for exemption. AB 1855 allows such projects to qualify if they provide new daily passenger rail service between termini more than five miles apart, where no such service exists as of January 1, 2027, and the service runs parallel to a state or interstate highway corridor. This change is intended to facilitate the development of new rail corridors in underserved areas, even if they do not initially use the cleanest available technology. The bill maintains existing requirements for public agency oversight, public notice, and workforce standards, including the use of a skilled and trained workforce for exempted projects. For projects exceeding $50 million or $100 million in cost, additional requirements apply, such as public meetings, business case and racial equity analyses, and mitigation of construction impacts. The bill also provides for periodic adjustment of cost thresholds based on the Consumer Price Index and clarifies that no state reimbursement is required for local agencies, as they have authority to levy fees to cover costs. Key points relevant to organizations focused on sustainable transportation, environmental justice, and public transit include the expanded eligibility for CEQA exemptions, which could accelerate the	Referred to Committee on Natural Resources	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1855

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A.B.1883: Workplace surveillance tools.	CA Assemb. Isaac Bryan (D-CA-055)	Assembly Bill 1883, as amended, establishes new regulations on the use of workplace surveillance tools by employers in California. The bill prohibits employers from using surveillance technologies to prevent compliance with labor or civil rights laws, infer information about workers engaging in protected activities, make inferences about a workerâ€™s emotional state or gait, or collect neural data. The use of facial recognition technology is specifically restricted, only being permitted for unlocking devices or granting access to secure areas. Employers are also barred from using surveillance tools to infer protected statuses such as veteran status, ancestry, religion, or disability, as defined under Section 12940 of the Government Code. However, the bill allows for the use of surveillance tools for safety purposes, provided they do not incorporate artificial intelligence that makes prohibited inferences or predictions about workers. The bill assigns enforcement authority to the Labor Commissioner, who may investigate violations, issue citations, and seek temporary relief. Public prosecutors are also empowered to enforce the law, and employees or their representatives may bring civil actions for damages, including punitive damages and attorneyâ€™s fees. Employers found in violation may be subject to civil penalties of up to $500 per violation, with penalties recoverable by employees, the Labor Commissioner, or public prosecutors, but not more than one penalty for the same violation. The bill clarifies that it does not preempt local ordinances that provide equal or greater protections for workers. The legislation applies to all employers, including public entities and labor contractors, and covers all workers, including employees and independent contractors. It defines key terms such as â€œworkplace surveillance tool,â€ â€œfacial recognition technology,â€ and â€œneural data,â€ and specifies that the law is a matter of statewide concern, applying to all cities, including charter cities. No specific funding allocations or deadlines are included in the bill. Key points relevant to organizations focused on worker privacy, civil rights, and labor protections include the prohibition of invasive surveillance technologies, the restriction of AI-driven inferences about protected characteristics or activities, and the establishment of clear enforcement mechanisms	From committee: Do pass and re-refer to Committee on Appropriations (Ayes 11. Noes 2.) (April 16). Re-referred to Committee on Appropriations	Oppose	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1883

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A.B.1898: Workplace artificial intelligence tools.	CA Assemb. Nicholas "Nick" Schultz (D-CA-044)	Assembly Bill 1898, as amended, establishes new requirements for employers in California regarding the use of artificial intelligence (AI) tools in the workplace. The bill defines key terms such as 'artificial intelligence,' 'automated decision system,' 'workplace AI tool,' and 'workplace surveillance tool,' and applies to all employers, including public entities and labor contractors. Employers are required to provide written notice to workers and their representatives at least 90 days before deploying a workplace AI tool, or by February 1, 2027, for existing tools, and upon hire for new workers. The notice must include detailed information about the AI tool, such as its purpose, the categories of employment-related decisions it may affect, the types of worker data collected, data storage practices, the tool's impact on job roles, and a summary of any risk assessments conducted. Employers must also maintain and annually provide an updated list of all workplace AI tools in use, including descriptions of any job tasks likely to be automated and the expected timeline for such impacts, starting February 1, 2028. The bill introduces significant transparency and accountability measures, requiring employers to disclose how AI tools are used in employment decisions and workplace surveillance, and to inform workers about potential impacts on their jobs. It also mandates that notices be written in plain language and provided in the language routinely used for workplace communications. Enforcement is provided through the Labor Commissioner, public prosecutors, or private civil actions by affected workers or their representatives. Remedies for violations include temporary relief, injunctive relief, punitive damages, attorneyâ€™s fees, and penalties of up to $500 per violation, with the possibility for either statutory or civil penalties, but not both, for the same violation. The bill clarifies that it does not preempt local ordinances that offer equal or greater protections and asserts statewide applicability, including to charter cities. Key points relevant to organizations focused on worker rights, privacy, and the ethical use of AI include the billâ€™s emphasis on transparency, worker notification, and the right to seek remedies for adverse impacts caused by AI tools. The legislation aligns with missions that advocate for informed consent, data privacy, and protection from automated decision-making that could negatively affect	Re-referred to Committee on Appropriations pursuant to Assembly Rule 96.	Oppose	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1898
A.B.2010: Veterinary medicine: veterinary surgery premises: spay and neuter services.	CA Assemb. Esmeralda Soria (D-CA-027)	Assembly Bill 2010 amends Section 4854 of the California Business and Professions Code, which governs the standards for veterinary premises under the Veterinary Medicine Practice Act. The bill clarifies that high-quality, high-volume spay or neuter servicesâ€”defined as the aseptic surgical sterilization of 20 or more dogs, cats, or rabbits within 12 consecutive hours by a veterinarianâ€”do not need to be performed in facilities that meet certain specified standards. Specifically, these services, whether conducted in a registered veterinary premises or by a veterinarian employed or contracted with a veterinary premises in a temporary setting, are exempt from requirements such as having a separate room reserved for aseptic surgical procedures, prohibitions on open shelving in surgical areas, and the need for equipment to view radiographs. The bill does not allocate new funding, nor does it impose new deadlines or timelines. Instead, it modifies existing law by providing greater flexibility for where and how high-volume spay and neuter services can be performed, potentially increasing access to these services and supporting animal welfare efforts. This change aligns with the mission of organizations focused on expanding access to affordable and efficient spay/neuter services, reducing barriers for mobile or temporary veterinary clinics, and promoting public health and animal population control.	Read second time and amended.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2010

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A.B.2027: Worker data: prohibitions: artificial intelligence.	CA Assemb. Chris Ward (D-CA-078)	Assembly Bill 2027, as amended, introduces new provisions to the California Labor Code aimed at protecting workers' personal information from being used in the development and deployment of artificial intelligence (AI) systems that could replicate, automate, or replace their jobs. The bill prohibits employers from using a workerâ€™s personal information, as defined by Section 1798.140 of the Civil Code, to train AI systems for these purposes. It also forbids employers from selling, disclosing, or otherwise providing access to such information to third parties for AI training intended to replicate, automate, or replace jobs. Vendors providing services to employers are similarly restricted from using or transferring workersâ€™ personal information for these AI-related purposes. Contracts between employers and vendors must include requirements for reasonable security procedures to protect workersâ€™ personal information from unauthorized or illegal access, use, or disclosure. The bill establishes enforcement mechanisms by granting authority to the Labor Commissioner and public prosecutors to investigate and address violations, including issuing citations and seeking temporary relief. Workers or their representatives who suffer violations may bring civil actions for damages, injunctive relief, punitive damages, and attorneyâ€™s fees and costs. Statutory penalties of up to $500 per violation may be imposed, with the penalty recoverable either as a statutory penalty paid to the worker or as a civil penalty, but not both for the same violation. The bill clarifies that it does not preempt local ordinances that provide equal or greater protections for workers. Key points relevant to organizations focused on worker rights, privacy, and the ethical use of AI include the explicit prohibition on using worker data for AI training that could threaten job security, the requirement for robust data security measures, and the provision of strong enforcement and remedies for affected workers. The bill aligns with missions centered on safeguarding worker privacy, preventing job displacement due to AI, and ensuring accountability for misuse of personal information in employment contexts. No specific funding allocations or appropriations are included in the bill, and it does not establish	From committee: Do pass and re-refer to Committee on Appropriations (Ayes 10. Noes 3.) (April 21). Re-referred to Committee on Appropriations	Watch	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2027

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A.B.2224: County recorders: fees.	CA Assemb. Heather Hadwick (R-CA-001)	Assembly Bill 2224 proposes significant updates to the statutes governing California county recorders, focusing on modernizing fee structures, enhancing public access, and mandating technological upgrades. The bill increases the base fee for recording and indexing the first page of a document from $10 to $15 and each additional page from $3 to $4, while eliminating extra fees for nonconforming print spacing and page dimensions. It also repeals additional indexing fees based on the number of names or references to previously recorded documents, streamlining and standardizing the fee structure. The bill requires that all fees collected be restricted for use solely by the county recorderâ€™s office, supporting the modernization, retention, and retrieval of recorded documents, and mandates that county recorders implement an electronic recording delivery system by January 1, 2028. The legislation introduces new requirements for county recorders to provide access to true copies of public records for each recorded instrument, paper, or notice, thereby facilitating public inspection and transparency. It also establishes a process for correcting errors in the public index of records, requiring corrections within 30 business days upon sufficient evidence. The bill clarifies and extends the use of certain fees, such as the $1 fee for archiving, which is now to be used indefinitely for archiving as determined by the county recorder, rather than being limited to micrographics conversion. AB 2224 removes the sunset date for county recorders to contract with a broader range of entities for electronic recording delivery systems, making permanent the authority to contract with authorized submitters beyond those previously specified. It expands the types of documents eligible for secure electronic submission, no longer limiting this to reconveyances, substitutions of trustee, or assignments of deed of trust. The bill also updates the regulatory framework for the Attorney Generalâ€™s oversight of electronic recording delivery systems, ensuring ongoing certification, security, and uniformity across counties. The bill maintains or clarifies the authority for county recorders to charge additional fees for specific	Re-referred to Committee on Local Government	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2224
A.B.2295: Regional housing need: affordable housing.	CA Assemb. Natasha Johnson (R-CA-063)	Assembly Bill 2295, introduced in the 2025â€“26 California legislative session, proposes to add Section 65584.2.3 to the Government Code, focusing on regional housing needs and affordable housing. The bill allows local governmentsâ€”defined as cities, counties, or city and county entities, including charter jurisdictionsâ€”to voluntarily enter into agreements with one another to jointly fund new housing development projects. Under these agreements, the new housing units can be counted toward each participating localityâ€™s share of the regional housing needs allocation, provided two main conditions are met: first, the project must be jointly funded by the local governments with a minimum combined contribution of $60,000 per unit; second, the development must include affordable housing units for very low and lower income households, as defined by existing sections of the Health and Safety Code. This measure builds on existing law, which already allows similar agreements between local governments and federally recognized Native American tribes, by extending the option to inter-local government collaborations. The bill does not appropriate new state funds, nor does it impose state-mandated local programs, but it does create a new mechanism for localities to meet their state-mandated affordable housing obligations through cooperative efforts. The legislation is particularly relevant to organizations focused on affordable housing, regional planning, and intergovernmental collaboration, as it provides a new tool for increasing affordable housing supply and flexibility in meeting regional housing targets.	Referred to Coms. on Committee on Housing and Community Development and L. GOV.	Sponsored			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2295

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A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. Kate Sanchez (R-CA-071)	Assembly Bill 2307, as amended, authorizes the Western Riverside Council of Governments (WRCOG), in coordination with the California Department of Transportation (Caltrans), to establish and administer a traffic signal synchronization pilot program for its member local agencies. The purpose of the pilot is to evaluate a regional model for coordinating traffic signal timing between state highways and local streets and roads, with the goal of improving traffic flow, reducing congestion and vehicle idling, enhancing safety, and increasing the efficiency of existing transportation infrastructure. The bill specifies that eligible activities under the pilot may include studies, implementation of coordinated and adaptive signal timing plans, technology upgrades, and data collection related to travel time reliability, congestion reduction, safety, and emissions outcomes. The WRCOG, in coordination with Caltrans, is required to assess the pilotâ€™s impacts on congestion, travel time reliability, operational efficiency, and vehicle emissions, and to submit a report to the Legislature by January 1, 2028, summarizing outcomes, best practices, challenges, and recommendations regarding the potential for statewide application of the program. The pilot program is authorized until January 1, 2032, after which the section is repealed. The bill makes legislative findings regarding the necessity of a special statute for WRCOG due to the unique traffic needs of its member agencies. No specific funding allocations are detailed in the bill, and participation by local agencies is voluntary and at their own cost. The legislation modifies existing law by granting WRCOG, rather than Caltrans, the authority to lead the pilot program in coordination with the state, and removes provisions that would have allowed for expansion of the pilot based on positive evaluation results.	From committee: Do pass and re-refer to Committee on Appropriations with recommendation: To Consent Calendar. (Ayes 16. Noes 0.) (April 13). Re-referred to Committee on Appropriations	Sponsored			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2307
A.B.2567: CalWORKs: immediate assistance.	CA Assemb. Celeste Rodriguez (D-CA-043)	Assembly Bill 2567 amends Section 11266 of the California Welfare and Institutions Code, which governs the CalWORKs program providing cash assistance and benefits to low-income families. The bill modifies the process by which counties determine an applicantâ€™s need for immediate assistance and apparent eligibility for CalWORKs aid. Specifically, it removes the requirement that applicants must first apply for any unconditionally available incomeâ€“such as unemployment insurance, Social Security, veteransâ€™ benefits, or state disability insuranceâ€“before being considered for immediate or homeless assistance. This change is intended to streamline access to emergency aid for families facing urgent needs, such as lack of housing, food, utilities, essential clothing, or transportation, and ensures that a notice of eviction automatically qualifies as an emergency regardless of the applicantâ€™s liquid resources. The bill maintains the provision that eligible applicants receive up to $200 or the maximum eligible amount within one working day, with eligibility to be verified within 15 working days, and advance payments offset against the first grant payment. It also clarifies that counties may deny immediate payments if the need is met by other programs, such as CalFresh or nonrecurring special needs payments, provided certain conditions are met, and ensures that applicants are informed of their options in writing. The bill stipulates that no continuous appropriation from the General Fund will be made for its purposes, but if the Commission on State Mandates determines that the bill imposes state-mandated costs, local agencies and school districts will be reimbursed according to existing statutory procedures. These changes are designed to reduce administrative barriers and expedite emergency support for vulnerable families, aligning with the mission of organizations focused on poverty alleviation, family stability, and access to social safety net programs.	Re-referred to Committee on Appropriations	Sponsored			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2567

2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
A.B.2656: Public employees: notice: artificial intelligence performing service within scope of work.	CA Assemb. Cottie Petrie-Norris (D-CA-073)	Assembly Bill 2656, as amended, introduces a new requirement for certain state and local public employers in California regarding the use of generative artificial intelligence (GenAI) in the workplace. Specifically, the bill mandates that public employers, as defined under Section 3555.5 of the Government Code, must provide at least 45 daysâ€™ written notice to recognized employee organizations before they develop, purchase, implement, or utilize GenAI to perform services that fall within the scope of work of job classifications represented by those organizations. The bill defines 'generative artificial intelligence' and 'artificial intelligence' by referencing their definitions in Section 11549.64 of the Government Code. This legislative action builds upon existing frameworks, such as Executive Order No. N-12-23 and the Generative Artificial Intelligence Accountability Act (Chapter 928, Statutes of 2024), which require state agencies to assess the use, risks, and opportunities of GenAI, and to consult with employee representatives in these processes. However, AB 2656 specifically focuses on ensuring that employee organizations are formally notified in advance of any GenAI-related changes that could impact their membersâ€™ job functions. The bill does not allocate new funding, nor does it establish a state-mandated local program, but it does introduce a new procedural requirement for public employers. The 45-day notice period is the primary timeline established by the bill, aiming to provide employee organizations with sufficient time to respond or engage in dialogue regarding the introduction of GenAI into their represented job classifications. This measure aligns with broader efforts to ensure transparency, worker engagement, and consideration of labor interests as artificial intelligence technologies are integrated into public sector operations.	From committee: Do pass and re-refer to Committee on Appropriations (Ayes 7. Noes 0.) (April 22). Re-referred to Committee on Appropriations	Watch		Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2656
S.B.1: Personal income taxes: exclusion: Military Services Retirement and Surviving Spouse Benefit Payment Act.	CA Sen. Kelly Seyarto (R-CA-032)	The legislative text introduces amendments to the Revenue and Taxation Code, specifically adding and repealing Sections 17132.9 and 17132.10, to exclude certain military-related income from state personal income tax. For taxable years beginning on or after January 1, 2025, and before January 1, 2035, the bill excludes from gross income up to $20,000 of retirement pay received by qualified taxpayers from the federal government for service in the uniformed services. Similarly, it excludes up to $20,000 of annuity payments received by qualified taxpayers under the United States Department of Defense Survivor Benefit Plan. A qualified taxpayer is defined as an individual whose adjusted gross income does not exceed $125,000, or $250,000 for surviving spouses filing jointly. The bill aims to honor California veterans, encourage them to remain in the state, and increase the number of skilled veterans in the workforce. It also outlines the specific goals and objectives of these tax exclusions, such as enhancing the economic security of retired veterans and their families. The legislation mandates the collection of data to assess the effectiveness of these exclusions, with a report due by December 1, 2034. The bill takes effect immediately as a tax levy and does not require state reimbursement to local agencies or school districts.	Returned to Secretary of Senate pursuant to Joint Rule 56.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB1
S.B.239: Open meetings: teleconferencing: subsidiary body.	CA Sen. Jesse Arreguin (D-CA-007)	Senate Bill No. 239, introduced by Senator ArreguÃ-n, amends the Government Code to allow subsidiary bodies of local agencies to use alternative teleconferencing provisions for meetings, with specific requirements for notice, agenda, and public participation. The bill mandates that subsidiary bodies post agendas at designated physical meeting locations and requires members to appear on camera during meetings accessible online. It also stipulates that any final recommendations by a subsidiary body must be presented at a regular meeting of the legislative body that established it. The bill exempts subsidiary bodies with jurisdiction over police oversight, elections, or budgets from these provisions. Additionally, the bill includes legislative findings to justify the limitation on public access to protect the privacy of public officials. These provisions are set to be repealed on January 1, 2030.	In Assembly. Read first time. Held at Desk.	Support	Support	Support	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB239

CALIFORNIA
2026 County of Riverside Official Bill List

2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
S.B.299: California Environmental Quality Act: exemption: day care center: family daycare home: zoning.	CA Sen. Christopher Cabaldon (D-CA-003)	Senate Bill 299, as amended, modifies the California Environmental Quality Act (CEQA) to expand exemptions for certain child care facilities. Previously, CEQA exempted projects consisting exclusively of day care centers not located in residential areas. This bill broadens the exemption to include both day care centers and family daycare homes, as defined in the Health and Safety Code, when these facilities are located on parcels zoned exclusively for residential use. However, the exemption does not apply to projects situated within 3,200 feet of active oil or natural gas extraction or refining facilities, nor to those located on natural and protected lands as defined by Section 21067.5 of the Public Resources Code. The bill also clarifies that no state reimbursement to local agencies or school districts is required, as these entities have the authority to levy fees to cover any costs associated with the new exemptions. The primary impact of this legislation is to facilitate the establishment and operation of day care centers and family daycare homes in residential zones by removing the requirement for CEQA review, except in specified sensitive areas. This aligns with efforts to increase access to child care services and reduce regulatory barriers for providers, particularly in residential communities, while maintaining environmental protections near oil and gas operations and on protected lands.	In Assembly. Read first time. Held at Desk.	Support	Support	Support	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB299
S.B.496: Advanced Clean Fleets Regulation: appeals advisory committee: exemptions.	CA Sen. Melissa Hurtado (D-CA-016)	Senate Bill No. 496, introduced by Senator Hurtado, proposes amendments to the Advanced Clean Fleets Regulation, which is part of California's efforts to transition medium- and heavy-duty truck fleets to zero-emission vehicles. The bill mandates the establishment of the Advanced Clean Fleets Regulation Appeals Advisory Committee to review appeals of denied exemption requests from the regulation's requirements. The committee, composed of representatives from various governmental and nongovernmental entities, is required to meet monthly, and its proceedings must be publicly accessible. The bill also introduces exemptions for vehicles anticipated to respond to emergency situations, allowing them to be treated similarly to authorized emergency vehicles. Additionally, it prohibits the state board from requiring documentation of a zero-emissions vehicle purchase agreement for certain compliance extensions, and it allows internal combustion engine vehicles to be counted as zero-emissions vehicle purchases under specific conditions. The bill aims to provide a structured process for appeals and exemptions while maintaining transparency and public involvement.	Returned to Secretary of Senate pursuant to Joint Rule 56.	Support		Sponsor	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB496
S.B.534: Green Empowerment Zone for the Salton Sea and Southeastern Desert Valleys.		Senate Bill No. 534, introduced by Senator Padilla, proposes the establishment of a Green Empowerment Zone for the Salton Sea and Southeastern Desert Valleys, effective until January 1, 2035. This zone aims to stimulate economic development in historically disinvested areas of California's southeastern desert region by leveraging public and private investments, particularly in clean energy and lithium extraction. The bill outlines the governance structure of the empowerment zone, which includes a board of directors composed of representatives from local governments, tribal governments, large employers, educational institutions, and community organizations. The board is tasked with identifying projects that utilize public funds effectively, improve economic vitality, and support a transition to a clean energy economy. The bill mandates the submission of annual progress reports to the Legislature and the Governor's Office of Business and Economic Development starting January 1, 2027. The empowerment zone is designed to enhance the region's competitiveness in securing funds and resources, with a focus on communities historically excluded from economic development benefits. The legislation emphasizes collaboration with state, federal, and local entities to advance the region's economy and quality of life.	Referred to E.D., G., & H.I.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB534

2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
S.B.577: State Government.	CA Sen. John Laird (D-CA-017), CA Sen. Benjamin "Ben" Allen (D-CA-024)	Senate Bill 577 introduces a series of amendments and additions to California's Code of Civil Procedure and Education Code, primarily affecting civil litigation involving public entities, procedures for childhood sexual assault claims, and school district finance mechanisms. The bill shortens the statute of limitations for victims of childhood sexual assault (occurring before January 1, 2024) to 22 years after reaching majority or 3 years after discovery of injury, and imposes a higher standard of gross negligence for claims against public entities or their employees filed by plaintiffs aged 40 or older after April 15, 2025. It also requires certificates of merit to be filed concurrently with complaints in such cases, and prohibits courts from accepting filings without them. For cases involving the MacLaren Childrenâ€™s Center or certain Los Angeles County juvenile facilities, claims must be filed by January 1, 2026, and settlement funds for claimants aged 40 or older cannot be disbursed until certificate requirements are met and reviewed by a special master. The bill eliminates the possibility of treble damages against public entities in cover-up cases and allows courts to structure judgments against public entities to be paid over time, considering the entityâ€™s mission and financial status. In civil litigation, the bill removes the 21-day safe harbor for correcting bad-faith filings in certain actions against public entities and expands the ability to seek defense costs to include demurrers, while prohibiting attorneys from passing such costs to clients. Financially, the bill authorizes school districts and related entities to participate in state or local intercepts for debt repayment, including tort liabilities, and extends the maximum term for emergency apportionment loan repayment from 20 to 30 years, with the Department of Finance determining terms in consultation with relevant parties. The bill also clarifies the timing and validity of bonds issued to cover tort judgments or settlements against public agencies. Finally, it specifies that no state reimbursement is required for certain new local mandates unless determined otherwise by the Commission on State Mandates.	Ordered to inactive file on request of Assembly Member Aguiar-Curry.	Support	Active Watch		https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB577
S.B.601: Water: waste discharge.	CA Sen. Benjamin "Ben" Allen (D-CA-024)	Senate Bill 601, as amended, significantly expands California's regulatory authority over water quality by amending the Water Code to include 'nexus waters'â€”defined as all state waters not classified as 'navigable waters' under federal lawâ€”within the scope of state water quality control and waste discharge requirements. The bill authorizes the State Water Resources Control Board to adopt water quality control plans for these nexus waters, ensuring that existing water quality standards as of May 24, 2023, remain in effect unless superseded by more stringent standards. It mandates that both the state and regional boards include nexus waters in all processes under the federal Clean Water Act, such as the California Integrated Report and the establishment of total maximum daily loads. For discharges from point sources to nexus waters, the bill requires implementation of requirements at least as stringent as those under the Federal Water Pollution Control Act, and prohibits the use of waivers for such discharges. The bill also introduces annual cost-of-living adjustments to civil monetary penalties for violations, with the additional funds directed to a newly established Penalty Adjustment Account within the Waste Discharge Permit Fund, to be used for cleanup and abatement of water pollution. Enforcement authority is broadened, allowing the Attorney General, state and regional boards, and local prosecutors to bring actions related to nexus waters, with penalties up to $75,000 per day per violation. The bill clarifies that for regulatory and enforcement purposes, nexus waters are to be treated as navigable waters under federal law, and that waste discharge requirements for these waters must meet or exceed federal standards. It also ensures that the most stringent applicable provision prevails in the event of a conflict with existing state law, and that the bill's provisions are severable. No state reimbursement to local agencies is required, as the bill does not impose unfunded mandates.	August 29 hearing postponed by committee.	Oppose		Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB601

2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
S.B.694: Deceptive practices: service members and veterans.	CA Sen. Bob Archuleta (D-CA-030), CA Sen. Sabrina Cervantes (D-CA-031)	Senate Bill No. 694, approved in February 2026, amends Californiaâ€™s Civil Code Section 1770 and Military and Veterans Code Section 401 to strengthen protections against unfair and deceptive business practices targeting service members and veterans. The bill expands the definition of 'public social services' to include all veterans benefits, not just pensions, and broadens the definition of 'unreasonable fee' to cover fees for federal veterans benefits that exceed those allowed for accredited attorneys or claims agents by the U.S. Department of Veterans Affairs (VA). It prohibits individuals and businesses from soliciting, contracting for, charging, or receiving fees for preparing, presenting, or prosecuting claims for VA benefits, except as permitted under federal law, and makes contracts violating these provisions void. The bill also extends restrictions on accessing military and veteransâ€™ digital credentials, making it illegal to require current or former service members to log in to, share credentials for, or access Department of Defense, VA, or Department of Homeland Security computer systems for commercial transactions. Violations of these provisions are classified as misdemeanors, subject to penalties including fines and imprisonment, and create a state-mandated local program, though the bill specifies that no state reimbursement is required for local enforcement costs. The legislation further amends the Consumers Legal Remedies Act to clarify and expand the list of unlawful business practices, including deceptive advertising, misrepresentation, and charging unreasonable fees for assisting with public social services or veterans benefits. It requires clear and conspicuous disclosures in advertisements and solicitations, particularly those related to veteransâ€™ benefits, and mandates specific disclaimers for events or promotions not affiliated with official veterans organizations. The bill also voids any contract or transaction entered into in violation of these new protections and provides for civil remedies, including actual damages and attorneyâ€™s fees, for injured parties. Additionally, it prohibits conditioning military or veteran discounts on the waiver of legal rights and voids any such waivers. Key timelines include the operative date of July 1, 2024, for the amended Military and Veterans Code Section 401, and a requirement that, as of July 1, 2025, all required disclosures and notices must meet	Chaptered by Secretary of State. Chapter 1, Statutes of 2026.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB694

2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
S.B.716: Lifeline program: broadband internet access service.	CA Sen. Maria Durazo (D-CA-026)	Senate Bill 716 amends the California Public Utilities Code to expand the state's Lifeline program, which traditionally subsidizes basic telephone service for low-income households, to also include stand-alone broadband internet access as an eligible service. The bill directs the California Public Utilities Commission (CPUC) to establish a mechanism allowing internet service providers (ISPs) to voluntarily offer broadband plans as Lifeline services, provided they offer at least one plan with speeds of at least 100 Mbps downstream and 20 Mbps upstream for $30 or less per month. The CPUC may adjust these requirements in areas where such service is not available. The bill prohibits requiring subscribers to bundle voice and internet services to receive the subsidy and limits each household to one state Lifeline subsidy, though federal subsidies may also be used. ISPs are not required to be designated as eligible telecommunications carriers to participate, except in certain cases for affiliates of small independent telephone corporations. The CPUC is tasked with preventing inappropriate upselling to Lifeline subscribers and must report to the Legislature by December 31, 2026, on any surcharge increases needed to fund the expanded program, with a cap that prevents the surcharge from exceeding the highest rate collected in the previous four years as of January 1, 2026. Implementation rules must be adopted by July 1, 2027, and the CPUC must report on the program's performance and fiscal impact by July 1, 2028. These provisions are set to be repealed on January 1, 2032. The bill does not require state reimbursement to local agencies, as any costs arise from changes to criminal penalties. The legislation aligns with the organization's mission to promote digital equity and affordable broadband access for low-income Californians, especially in light of the loss of federal broadband affordability support.	Ordered to inactive file on request of Assembly Member Aguiar-Curry.				https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB716

2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
S.B.947: Employment: automated decision systems.	CA Sen. Jerry McNerney (D-CA-005)	Senate Bill 947 establishes new regulations in California governing the use of automated decision systems (ADS) by employers in employment-related decisions. The bill defines ADS as computational processes, including those using artificial intelligence or machine learning, that assist or replace human decision-making and materially impact individuals in the workplace. Employers are prohibited from using ADS to violate labor or civil rights laws, conduct predictive behavior analysis, infer protected status, or take adverse action against workers for exercising legal rights. The bill also restricts the use of individualized worker data for compensation decisions unless justified by task-related cost differentials. Employers are barred from relying solely on ADS outputs for disciplinary, termination, or deactivation decisions; instead, a human reviewer must independently investigate and corroborate ADS outputs with additional evidence. If the ADS output cannot be corroborated or is found inaccurate, it cannot be used for adverse employment actions. Workers have the right to request, once every 12 months, a copy of their own data used by an ADS in such decisions, with privacy safeguards for third partiesâ€™ information. The legislation requires employers who primarily rely on ADS for adverse employment decisions to provide affected workers with a written post-use notice. This notice must be clear, in the workerâ€™s primary language, and include details such as the use of ADS, the involvement of a human reviewer, contact information for further inquiries, and assurances against retaliation. Upon request, employers must also provide a plain-language document outlining the specific decision, the worker data used, the ADS output, corroborating evidence, the ADS vendor, and any completed impact assessments. The bill prohibits retaliation against workers for asserting their rights under these provisions, filing complaints, or participating in investigations. Enforcement of the billâ€™s provisions is assigned to the Labor Commissioner, who may investigate violations, issue citations, and seek temporary relief. Alternatively, workers or their representatives may bring civil actions for damages, including punitive damages and attorneyâ€™s fees, and public prosecutors may also enforce the law. Employers found in violation are subject to a $500 civil penalty. The bill clarifies that it does not preempt local ordinances offering greater protections, and employers	Read second time and amended. Re-referred to Committee on Appropriations	Opposed- Prior Version	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB947
S.B.974: Property taxation: change in ownership: generational transfers: special needs trusts.	CA Sen. Kelly Seyarto (R-CA-032)	Senate Bill 974, as amended, revises Section 63.2 of the California Revenue and Taxation Code to clarify and expand the property tax exclusion for certain intergenerational transfers of real property. The bill maintains that transfers of a principal residence or family farm between parents and children, or between grandparents and grandchildren (if all parents are deceased), are not considered a 'change in ownership' for property tax reassessment purposes, provided specific conditions are met, such as the transferee occupying the property as a principal residence within one year and filing for the appropriate exemption. The bill specifically amends the definition of 'transfer' to explicitly include transfers made through special needs trusts, in addition to other inter vivos or testamentary trusts, thereby ensuring that property held in such trusts for the benefit of disabled individuals can qualify for the exclusion. The legislation outlines detailed procedures for filing claims, timelines for eligibility, and the calculation of taxable value, including provisions for late filings and associated processing fees. It also mandates the State Board of Equalization to develop necessary forms and emergency regulations to implement these changes. The bill does not introduce new funding allocations or appropriations, nor does it establish new deadlines beyond those already specified for claim filings and regulatory actions. Overall, SB 974 aligns with efforts to protect family continuity in home and farm ownership, particularly for families with members who have special needs, by preventing reassessment and potential tax increases upon generational transfers through special needs trusts.	Read second time. Ordered to consent calendar.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB974

2026_RivCo Official Bill List - CA	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	UCC Stance (Urban Counties of CA)	CSAC Stance (CA State Association of Counties)	Source Link
S.B.1036: Mitigation Fee Act.		Senate Bill 1036 amends Sections 66001 and 66013 of the California Government Code, which pertain to the Mitigation Fee Act and the imposition of fees by local agencies as conditions for development project approvals. The bill introduces new requirements to ensure that when a development project involves the demolition or change of an existing use, any fees imposed must be offset so that only the incremental impact of the new development on public facilities or services is charged. This means that developers will not be charged for impacts that were already present due to the previous use, and any offset amount that exceeds the new fee is not refundable or transferable to other fees. The bill also clarifies that a 'change in use' refers to situations where the use of an existing structure changes without demolition. Additionally, the bill modifies the rules for calculating capacity charges for water and sewer connections. When a change in the capacity of an existing water or sewer connection is proposed, local agencies are required to calculate the capacity charge based solely on the incremental change in capacity. If the proposed capacity is less than the existing capacity, no refund, credit, or transfer of the difference is permitted. These changes are intended to ensure that fees and charges more accurately reflect the actual impact of new development on public infrastructure, and to prevent overcharging or double-charging developers for existing capacity or prior uses. The bill maintains existing requirements for local agencies to identify the purpose and use of fees, demonstrate a reasonable relationship between the fee and the development's impact, and provide public reporting and transparency regarding the collection and expenditure of such fees. No new funding allocations or appropriations are introduced by this bill, nor are there specific deadlines or timelines beyond those already established in existing law for reporting and refunding unexpended fees. These amendments align with the goals of organizations focused on fair land use, housing affordability, and responsible infrastructure financing by promoting transparency, equity, and proportionality in the imposition of development-related fees. The bill seeks to prevent local agencies	Read second time and amended. Ordered to third reading.	Watch-High Priority		Concerns	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB1036

FEDERAL
2026 County of Riverside Official Bill List

2026_RivCo Official Bill List - FED	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	Future Hearing Dates	Source Link
H.R. 471: Fix Our Forests Act	Rep. Bruce Westerman (R-AR-4)	The legislation is a comprehensive effort to enhance forest management and mitigate wildfire risks across National Forest System lands, public lands managed by the Bureau of Land Management, and Tribal lands. It introduces "fireshed management areas," designated based on wildfire risk, and establishes a Fireshed Center to improve interagency coordination and provide data-driven support for fire management. To expedite processes, certain activities are exempted from the National Environmental Policy Act (NEPA) requirements, and existing laws like the Healthy Forests Restoration Act of 2003 are amended to expand project scopes and include additional fire regime groups. The act mandates the formation of intra-agency strike teams to streamline environmental reviews and project implementations. Although specific funding provisions are not detailed, the act allows for shared management and operational costs between the Department of the Interior and the Forest Service. Fireshed designations are set for five-year terms, with updates every five years, and a sunset clause terminates certain authorities seven years post-enactment. Amendments to the Agricultural Act of 2014 include special districts in good neighbor agreements and extend stewardship contracts. The legislation emphasizes livestock grazing as a wildfire risk reduction strategy and enhances water source protection programs. Litigation reforms are introduced to limit judicial injunctions on agency actions unless a plaintiff's claim is likely to succeed on the merits. Additionally, the legislation establishes a Community Wildfire Risk Reduction Program to support interagency coordination in reducing wildfire risks in communities, including tribal communities, through research, adoption of fire-resistant building methods, and public-private partnerships for hazardous fuels management. A portal and uniform grant application process are created to streamline financial assistance applications. The Community Wildfire Defense Research Program is expanded to test and advance innovative designs for wildfire-resistant structures and communities, with a focus on affordable building materials and land use planning. The legislation also addresses vegetation management near electric transmission lines, allowing for the removal of hazard trees within 150 feet of power lines and establishing categorical exclusions for certain forest management activities. A "Seeds of Success" strategy is developed to enhance the	Committee on Agriculture, Nutrition, and Forestry Subcommittee on Conservation, Forestry, Natural Resources, and Biotechnology. Hearings held. With printed Hearing: S.Hrg. 119-27.	Support		https://www.congress.gov/bill/119th-congress/house-bill/471
H.R. 1225: To direct the United States Postal Service to designate a single, unique ZIP Code for Eastvale, California.	Rep. Ken Calvert (R-CA-41)	The legislation mandates the United States Postal Service to assign a distinct ZIP Code exclusively for the area of Eastvale, California. This directive aims to ensure that Eastvale has its own unique postal identifier, which is expected to improve mail delivery efficiency and address clarity for residents and businesses within the area. The bill stipulates a specific timeline, requiring the Postal Service to implement this change within 180 days following the enactment of the legislation. There are no financial allocations or modifications to existing laws associated with this legislative action.	Introduced in House	Support		https://www.congress.gov/bill/119th-congress/house-bill/1225

2026_RivCo Official Bill List - FED	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	Future Hearing Dates	Source Link
H.R. 3898: PERMIT Act	Rep. Mike Collins (R-GA-10)	The Promoting Efficient Review for Modern Infrastructure Today Act (PERMIT Act) proposes comprehensive amendments to the Federal Water Pollution Control Act (Clean Water Act) with the aim of streamlining permitting processes, clarifying regulatory requirements, and reducing administrative burdens for water-related infrastructure and development projects. Key provisions include requiring that water quality standards and criteria consider the cost and commercial availability of treatment technologies, and mandating that new or revised water quality criteria be issued through formal rulemaking for greater transparency. The Act extends the maximum term for National Pollutant Discharge Elimination System (NPDES) and general permits from five to ten years, and clarifies the scope of compliance for permit holders, specifying how water quality-based effluent limitations must be expressed. Significant changes are made to Section 401 water quality certifications, including stricter timelines for state and federal agencies to act on certification requests, limiting the grounds for denial to specific Clean Water Act provisions, and expediting judicial review for certain energy infrastructure projects. The Act also codifies that permits are not required for agricultural stormwater discharges or for pesticide applications compliant with the Federal Insecticide, Fungicide, and Rodenticide Act, with certain exceptions. It further clarifies the definition of "navigable waters" to exclude features such as ephemeral streams, certain agricultural lands, and groundwater, thereby narrowing federal jurisdiction. The Act seeks to improve efficiency in the issuance and reissuance of nationwide and general permits, particularly for linear infrastructure and pipeline projects, by streamlining environmental review requirements and limiting the need for interagency consultations under the Endangered Species Act and National Environmental Policy Act. It also imposes deadlines for agency requests for additional information during state program approval and for judicial review of permitting decisions, and restricts courts from vacating permits except in cases of imminent and substantial danger to health or the environment.	Received in the Senate and Read twice and referred to the Committee on Environment and Public Works.	Pending		https://www.congress.gov/bill/119th-congress/house-bill/3898
H.R. 4038: Wildfire Response and Preparedness Act of 2025	Rep. Young Kim (R-CA-40)	The Wildfire Response and Preparedness Act of 2025 directs the Secretaries of Agriculture and the Interior to establish standardized response times for wildland fire incidents on federal lands. Within 90 days of enactment, these agencies must set a response time standard, aiming for initial evaluation within 30 minutes of ignition and deployment of fire suppression assets within 3 hours. The Act requires a joint report to Congress within one year, detailing a unified point of contact for federal wildfire response, a consolidated budget request, key performance indicators for relevant agencies, and an assessment of current and needed firefighting resources. The report must also address improvements to dispatch systems, streamlining of federal contracting for firefighting assets, and the resources and authorities necessary to ensure year-round, nationwide availability of these assets. The legislation modifies current federal wildfire response protocols by mandating specific response time goals and enhanced interagency coordination, aligning with organizational missions focused on improving wildfire preparedness, response efficiency, and resource management.	Subcommittee Hearings Held	Support		https://www.congress.gov/bill/119th-congress/house-bill/4038

2026_RivCo Official Bill List - FED	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	Future Hearing Dates	Source Link
H.R. 4669: FEMA Act of 2025	Rep. Sam Graves (R-MO-6)	The Fixing Emergency Management for Americans Act of 2025 (FEMA Act of 2025) is a comprehensive legislative overhaul of the federal emergency management system, with the primary aim of improving disaster mitigation, preparedness, response, and recovery across the United States. The Act establishes the Federal Emergency Management Agency (FEMA) as a cabinet-level, independent agency within the executive branch, separating it from the Department of Homeland Security and granting it expanded authority and responsibilities. The Administrator of FEMA, appointed by the President with Senate confirmation, becomes the principal advisor to the President on emergency management, supported by a Deputy Administrator and Assistant Administrators with relevant expertise. The Act also creates an Office of the Inspector General within FEMA to ensure accountability and oversight. Key reforms include the transfer of all FEMA-related functions, personnel, and resources from the Department of Homeland Security to the newly independent agency, with a transition period of up to one year. The Act preserves certain grant programs within the Department of Homeland Security but allows FEMA to continue administering them during the transition. It also establishes a FEMA Working Capital Fund to manage operational expenses and authorizes the creation of a Veterans Advocate within FEMA to ensure fair treatment of veterans in disaster assistance processes. The legislation introduces significant changes to disaster assistance and mitigation programs. It streamlines and expedites the repair, restoration, and replacement of public and private nonprofit facilities damaged by disasters, with a minimum federal cost share of 75%, adjustable based on state mitigation efforts. The Act allows for block grants for small disasters, simplifies debris removal requirements, modernizes disaster management cost structures, and mandates the consolidation and simplification of information collection and preliminary damage assessments. It also enhances the eligibility and direct access of Indian tribal governments to disaster assistance and strengthens closeout procedures for critical services.	Subcommittee on Economic Development, Public Buildings, and Emergency Management Discharged	Support		https://www.congress.gov/bill/119th-congress/house-bill/4669
H.R. 5682: To take certain land in the State of California into trust for the benefit of the Pechanga Band of Indians, and for other purposes.	Rep. Darrell Issa (R-CA-48)	H.R. 5682 directs the federal government to take approximately 860 acres of land in Riverside County, California, currently managed by the Bureau of Land Management, into trust for the benefit of the Pechanga Band of Indians. Once in trust, this land will become part of the Pechanga Band's reservation and will be managed according to laws and regulations that apply to tribal trust lands. The legislation stipulates that the land must be maintained as open space and can only be used for purposes consistent with the preservation of archaeological, cultural, and wildlife resources. Construction and maintenance of utilities or structures are permitted only if they align with these conservation goals. Importantly, the bill explicitly prohibits any class II or class III gaming activities on the land under the Indian Gaming Regulatory Act. The act also ensures that existing water rights and service agreements remain unchanged and unaffected by the transfer. A map detailing the land in question will be kept on file and made available for public inspection at the Bureau of Land Management. No specific funding allocations or deadlines are mentioned in the bill. The legislation aligns with the mission of organizations focused on tribal sovereignty, land preservation, and the protection of cultural and natural resources, while also addressing concerns about the expansion of gaming activities.	Reported (Amended) by the Committee on Natural Resources. H. Rept. 119-585.	Watch		https://www.congress.gov/bill/119th-congress/house-bill/5682

2026_RivCo Official Bill List - FED	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	Future Hearing Dates	Source Link
H.R. 5935: Agua Caliente Band of Cahuilla Indians Water Rights Settlement Act	Rep. Ken Calvert (R-CA-41)	The Agua Caliente Band of Cahuilla Indians Water Rights Settlement Act is designed to resolve longstanding disputes over water rights between the Agua Caliente Band of Cahuilla Indians (the Tribe), the United States (as trustee for the Tribe and individual allottees), and local water agencies in California. The Act ratifies and implements a comprehensive settlement agreement that quantifies and confirms the Tribeâ€™s right to produce and use up to 20,000 acre-feet per year (AFY) of groundwater from the Indio Subbasin, with a priority date no later than the 1876 and 1877 Executive Orders that established the Reservation. This Tribal Water Right is held in trust by the United States, is not subject to state law except in certain federal adjudications, and cannot be lost through non-use, forfeiture, or abandonment. The Act also recognizes the Tribeâ€™s authority to impose and collect water-related fees and taxes, preempts certain state and local taxes (notably the Riverside County Ad Valorem Property Tax on possessory interests when the Tribe imposes its own tax), and ensures that allottees receive equitable benefits and due process in water allocations. The legislation establishes the Agua Caliente Settlement Trust Fund, managed by the Secretary of the Interior, with four dedicated accounts: Development Projects ($300 million), Groundwater Augmentation ($100 million), Water Management ($50 million), and Operation, Maintenance, and Replacement Costs ($50 million). These funds, totaling $500 million in mandatory appropriations, are to be used for water infrastructure, groundwater augmentation, water management, and related costs, with $50 million immediately available for initial development projects. The Act provides mechanisms for the Tribe to withdraw and use these funds under approved management or expenditure plans, with annual reporting requirements and prohibitions on per capita distributions to Tribal members. The Act also allows for cost adjustments based on construction indices and market volatility, and sets out the process for the return of unexpended funds if the settlement is not fully implemented by December 31, 2035 (or a later agreed date). The Act modifies existing federal statutes by preempting certain state and local taxes and charges, such as the replenishment assessment charge (RAC) and the Riverside County Ad Valorem	Introduced in House	Support		https://www.congress.gov/bill/119th-congress/house-bill/5935

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

January 22, 2026

The Honorable David Alvarez
California State Assembly, District 30
1021 O Street, Suite 5320
Sacramento, CA 95814

Re: AB 35 (Alvarez) Safe Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024: Administrative Procedure Act: exemption: program guidelines and selection criteria. As Amended 1/14/26--SUPPORT

On behalf of the County of Riverside, I write to thank you for introducing AB 35, which would exempt Proposition 4 funding from the Administrative Procedure Act (APA), as the measure comes before the Assembly for a floor vote.

California voters overwhelmingly approved Proposition 4 with the clear expectation that critical investments in water, climate resilience, wildfire prevention, and natural resource protection would be delivered efficiently and without unnecessary delay. AB 35 aligns with that voter intent by ensuring that Proposition 4 funds can be deployed in a timely, effective, and fiscally responsible manner.

Providing a full APA exemption for Proposition 4 is consistent with long-standing precedent established under prior natural resource bonds, including Propositions 84 and 68. Without this exemption, state agencies have indicated that APA rulemaking and Office of Administrative Law review could delay funding awards by 12 to 18 months, undermining the urgency of addressing pressing challenges such as groundwater recharge, water recycling, drinking water reliability, and wildfire prevention—many of which directly affect Inland Empire communities.

From a local government perspective, these delays create real consequences. Existing programs were developed and implemented under the frameworks established by

earlier bonds, and they are best positioned to move funds quickly to shovel-ready projects. Requiring those programs to be restructured solely to comply with newly imposed APA requirements would introduce unnecessary administrative burdens and reduce flexibility, ultimately slowing project delivery and limiting the ability to braid funding sources to meet regional and statewide goals.

An APA exemption does not diminish transparency or public accountability. Agencies administering Proposition 4 funds will continue to operate under robust fiscal controls, reporting requirements, and oversight mechanisms, many of which already include established public engagement processes. AB 35 simply streamlines implementation, promotes consistency across programs, and removes avoidable barriers that delay investments voters clearly supported.

The County of Riverside strongly supports AB 35 and is urging our own delegation to support passage on the Assembly Floor. This legislation is essential to honoring voter intent, accelerating project delivery, and ensuring that Proposition 4 investments reach communities when they are needed most.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members of the Inland Empire Legislative Caucus

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

March 4, 2026

The Honorable Dr. Corey Jackson
California State Assembly
P.O. Box 942849
Sacramento, CA 94249-0060

Re: Assembly Bill 72 (AB 72) – Jackson
Electric Vehicle Economic Opportunity Zone
As introduced December 12, 2024 – SUPPORT

Dear Assemblymember Jackson:

On behalf of the County of Riverside Board of Supervisors, I am writing to express our strong support for AB 72, which would establish an Electric Vehicle Economic Opportunity Zone (EVEOZ) in Riverside County.

As California advances toward its statutory goal of 100 percent zero-emission passenger vehicle sales by 2035, it is critical that the economic opportunities generated by this transition — including workforce development, job creation, innovation, and educational pathways — are equitably distributed across regions. AB 72 provides a forward-looking framework to ensure that Riverside County and the broader Inland Empire are positioned to compete and thrive in California's clean transportation economy.

Riverside County is uniquely situated to serve as a regional hub for electric vehicle manufacturing, logistics, workforce training, and related innovation. As one of the fastest-growing counties in California, Riverside County continues to experience rapid population growth while also confronting longstanding challenges related to income disparities, workforce diversification, and air quality impacts associated with transportation and goods movement. Establishing an Electric Vehicle Economic Opportunity Zone in Riverside County would help align state climate objectives with local economic development strategies, ensuring that residents benefit directly from the clean energy transition.

AB 72 thoughtfully advances this goal by encouraging partnerships among educational institutions, electric vehicle manufacturers, workforce development entities, labor organizations, and financial institutions. By fostering coordinated investment and collaboration, the EVEOZ framework would expand access to high-quality job training programs, strengthen career pathways in emerging clean transportation industries, and support the transition of internal combustion engine–related businesses toward electric vehicle technologies.

From the County's perspective, this approach reflects our ongoing commitment to economic vitality, environmental stewardship, and long-term community resilience. Facilitating the growth of electric vehicle–related industries within Riverside County will not only help advance statewide emissions reduction goals but also create sustainable, well-paying jobs that support families and strengthen our local tax base. Moreover, targeted investment in workforce development ensures that historically underserved communities have access to the skills and opportunities necessary to participate in this rapidly evolving sector.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members of the Inland Empire Legislative Caucus

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

March 12, 2026

The Honorable Isaac Bryan
Chair, Assembly Natural Resources Committee
1020 N Street, Room 164
Sacramento, CA 95814

RE: Assembly Bill (AB) 1855 – Gonzalez
California Environmental Quality Act: exemption: passenger rail service
As Introduced February 11, 2026 – SUPPORT

Dear Representative Bryan:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for AB 1855, authored by Assemblymember Jeff Gonzalez. This measure would provide a targeted exemption under the California Environmental Quality Act (CEQA) for certain passenger rail projects, helping streamline critical transportation investments that expand mobility options for California residents.

Inland Southern California continues to experience significant population and economic growth, placing increasing pressure on our regional transportation network. Many communities, particularly inland and driving-dependent communities, lack viable alternatives to automobile travel. Expanding passenger rail service will be essential to meeting the region's growing mobility needs while helping improve air quality and reduce congestion on major corridors. AB 1855 builds on existing law by updating CEQA exemptions for eligible passenger rail projects, allowing these projects to move forward more efficiently while maintaining appropriate mitigation for construction-related impacts.

In the County of Riverside, the proposed Coachella Valley Rail Project illustrates the type of investment that could benefit from the streamlined approach provided in AB 1855. This proposed 144-mile passenger rail corridor would connect Los Angeles and the Coachella Valley, offering residents and visitors a reliable alternative to driving along Interstate 10—one of the region's most heavily traveled transportation corridors.

By helping advance projects such as the Coachella Valley Rail Project and other eligible passenger rail investments across California, AB 1855 will support improved mobility, economic opportunity, and regional connectivity for Riverside County and communities throughout the state.

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 Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: The Honorable Jeff Gonzalez, Assembly District 36
Honorable Members, Inland Empire Legislative Caucus

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

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March 10, 2026

The Honorable Natasha Johnson
California State Assembly
State Capitol
Sacramento, CA 95814

Re: County of Riverside Sponsorship of AB 2295 -Johnson
Regional Housing Need: Affordable Housing
As introduced February 19, 2026

Dear Representative Johnson:

On behalf of the County of Riverside, we are proud to sponsor AB 2295**,** legislation that will help local governments work more collaboratively to address California's housing shortage while advancing practical solutions for the production of affordable housing.

AB 2295 provides an important new tool by authorizing voluntary agreements between local governments to share Regional Housing Need Allocation (RHNA) credits for jointly funded housing developments. By allowing both the permitting jurisdiction and the financing partners to receive credit toward their state-mandated housing targets, the bill creates a meaningful incentive for cities and counties to collaborate on projects that might otherwise be difficult to complete.

As you know, every city and county in California must plan for and accommodate housing production targets assigned by the California Department of Housing and Community Development and regional councils of governments through the RHNA process. While these goals are essential to addressing the state's housing shortage, many jurisdictions—particularly geographically large and diverse counties such as Riverside—face significant challenges in meeting the targets for affordable housing across all income levels.

The high cost of infrastructure and development often makes it difficult for a single jurisdiction to independently fund and deliver large-scale affordable housing projects. In many cases, the most suitable locations for new affordable housing are within incorporated cities that already have access to water, sewer, transportation, and energy infrastructure. In recent years, the County of Riverside has invested over $100 million of housing funds into incorporated cities, generating almost $800 million in housing developments by leveraging this financing against other sources. Counties may have the financial capacity or funding tools to help support these projects, but current law provides limited mechanisms for cross-jurisdictional partnerships that allow both parties to receive credit toward their housing obligations.

AB 2295 thoughtfully addresses this gap by establishing a clear statutory framework for voluntary RHNA credit-sharing agreements between local governments. Under the bill, participating agencies may jointly fund housing developments and share the resulting RHNA credit. This approach encourages regional cooperation, leverages available public resources, and helps ensure that affordable housing is built in locations where infrastructure and services already exist.

We appreciate your leadership in advancing policies that support regional collaboration and address the housing needs of our communities. The County of Riverside is grateful for your partnership and for authoring legislation that provides local governments with the flexibility needed to make meaningful progress on one of California's most pressing challenges.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members, Inland Empire Legislative Caucus

April 8, 2026

The Honorable Celeste Rodriguez
California State Assembly
State Capitol
Sacramento, CA 95814

RE: SUPPORT – AB 2567 (Rodriguez) – CalWORKs Immediate Need and Homeless Assistance Reform

Dear Assemblymember Rodriguez:

On behalf of the County of Riverside Board of Supervisors, I am pleased to express our strong support for AB 2567, which would remove barriers to accessing critical emergency assistance for families applying for California Work Opportunity and Responsibility to Kids (CalWORKs).

The County of Riverside has been a strong advocate for this policy change and has worked to elevate this issue, including encouraging the California Welfare Directors Association to sponsor this important legislation. AB 2567 reflects a practical, on-the-ground solution informed by counties' direct experience administering CalWORKs and serving families in crisis.

Under current law, families applying for CalWORKs must meet several conditions before receiving temporary Homeless Assistance (HA) and/or Immediate Need (IN) benefits, including providing proof of applying for all Unconditionally Available Income (UAI), such as unemployment or disability benefits. While well-intentioned, this requirement often creates significant delays for families facing urgent crises. The process of applying for UAI can be complex and time-consuming, requiring internet access, documentation, and navigation of administrative systems that are often inaccessible to families experiencing homelessness.

In Riverside County, we routinely see families in immediate crisis—facing eviction, food insecurity, or utility shutoffs—who cannot meet UAI requirements quickly enough to receive timely benefits due to procedural barriers. With California receiving tens of thousands of CalWORKs applications each month, even a small percentage of applicants experiencing homelessness translates into thousands of families whose access to emergency support is delayed at a critical moment.

AB 2567 provides a thoughtful and targeted solution by allowing counties to determine apparent eligibility to CalWORKs, which is required to be eligible to temporary HA and IN benefits, without first requiring applicants to complete the UAI application process. Importantly, the bill maintains key program integrity safeguards: applicants must still be 'apparently' eligible for CalWORKs and must apply for and accept all UAI prior to final approval and receiving ongoing aid. Existing timelines, verification requirements, and payment limits also remain in place.

This balanced approach ensures that families in crisis can receive immediate assistance when they need it most, while preserving accountability and program requirements over the longer term. By removing unnecessary administrative barriers at the front end of the process, AB 2567 will help prevent homelessness, promote housing stability, and improve outcomes for vulnerable children and families.

The County of Riverside strongly supports efforts that improve the effectiveness, responsiveness, and accessibility of safety net programs. AB 2567 advances these goals by aligning CalWORKs policies with the realities faced by families in crisis and by empowering counties to respond quickly and appropriately.

Thank you for your leadership on this important issue and for authoring legislation that will make a meaningful difference for families across California.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members, County of Riverside Legislative Delegation

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

January 22, 2026

The Honorable Christopher Cabaldon
Member, California State Senate
1021 O Street, Suite 7320
Sacramento, CA 95814

RE: Senate Bill 299 California Environmental Quality Act: exemption: day care center: family daycare home: zoning. SUPPORT As Amended January 14, 2026

Dear Senator Cabaldon,

On behalf of the County of Riverside, I write to express the County's strong support for **SB 299**, as amended January 14, 2026, which would expand the recently enacted California Environmental Quality Act (CEQA) exemption for day care centers to include qualifying projects located in residential areas.

Access to affordable, reliable childcare is a critical issue for families across Riverside County and the broader Inland Empire. As one of the fastest-growing regions in the state, Riverside County continues to experience strong demand for childcare services that support working families, workforce participation, and the healthy development of young children. Unfortunately, the availability of licensed day care facilities has not kept pace with population growth, particularly in communities where facilities are most appropriately located—near neighborhoods and places of employment.

While the Legislature took an important step forward with **SB 131 (Chapter 24, Statutes of 2025)** by exempting day care centers from CEQA, the exemption's limitation to facilities located in commercial, industrial, or agricultural zones significantly restricts its practical impact. The overwhelming majority of day care centers are—and should be—situated in residential or mixed-use areas to best serve families. SB 299 thoughtfully builds on prior legislative action by extending the CEQA exemption to day care centers in residential areas.

CEQA plays an important role in protecting environmental resources and improving project decision-making. However, it was not intended to serve as a barrier to small-scale, community-serving facilities such as day care centers. In Riverside County, the misuse or overapplication of CEQA requirements can result in unnecessary costs,

delays, and litigation risks that discourage providers from opening or expanding facilities—directly limiting access to care for families and employers alike.

SB 299 strikes the appropriate balance by preserving CEQA's core purpose while preventing its misuse in a way that undermines urgently needed childcare investments. By reducing regulatory barriers and streamlining approval processes, this bill will help communities expand childcare capacity, strengthen local economies, and support working parents throughout the Inland Empire.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Members of the Inland Empire Legislative Delegation

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

February 17, 2026

Honorable Ken Calvert
House of Representatives
2205 Rayburn House Office Building
Washington, DC 20510

RE: House Resolution 5935 (H.R. 5935) - Calvert
Agua Caliente Band of Cahuilla Indians Water Rights Settlement Act
As Introduced November 7, 2025 – SUPPORT

Dear Representative Calvert:

On behalf of the County of Riverside Board of Supervisors, I write in support of the Agua Caliente Band of Cahuilla Indians Water Rights Settlement Act (HR 5935), which you introduced last year. As you are aware, this legislation will facilitate the execution of the water settlement agreement reached by the Agua Caliente Band of Cahuilla Indians (Tribe), Coachella Valley Water District (CVWD), and Desert Water Agency (DWA).

Your bill ratifies that the Tribe has a federally reserved water right up to 20,000 acre-feet per year of groundwater from the Indio Subbasin that is held in trust by the U.S. for the Tribe and individual allottees. The Tribe would also have surface water rights in Tahquitz Creek, Andreas Creek, and Whitewater Ranch, held in trust by the U.S. under the terms of the agreement. Domestic water service would not stop or switch to a tribal utility. Instead, CVWD and DWA would continue to supply households and businesses on the Reservation.

In addition, the legislation would establish a $500 million "Agua Caliente Settlement Trust Fund" in the U.S. Treasury to be administered by the Department of Interior. The fund would include accounts for development projects, groundwater augmentation, water management, and operation, maintenance, and replacement costs. The bill would transfer 2,742 acres of Bureau of Land Management land to the Tribe, with gaming prohibited on the transferred land.

The Riverside County Board of Supervisors appreciates the collaboration of the Tribe, CVWD, and DWA in reaching this historic water settlement. 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 Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Mr. Reid Milanovich, Chairman Agua Caliente Band of Cahuilla Indians
Honorable Members of the Riverside County Congressional Delegation

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

February 17, 2026

Honorable Alex Padilla
United States Senate
331 Hart Senate Office Building
Washington, DC 20510

RE: House Resolution 5935 (H.R. 5935) – Calvert
Agua Caliente Band of Cahuilla Indians Water Rights Settlement Act
As introduced November 7, 2025 - SUPPORT

Dear Senator Padilla:

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H.R. 5935 (Representative Ken Calvert) ratifies that the Tribe has a federally reserved water right up to 20,000 acre-feet per year of groundwater from the Indio Subbasin that is held in trust by the U.S. for the Tribe and individual allottees. The Tribe would also have surface water rights in Tahquitz Creek, Andreas Creek, and Whitewater Ranch, held in trust by the U.S. under the terms of the agreement. Domestic water service would not stop or switch to a tribal utility. Instead, CVWD and DWA would continue to supply households and businesses on the Reservation.

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Sincerely,

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Ken Calvert
Mr. Reid Milanovich, Chairman Agua Caliente Band of Cahuilla Indians
Coachella Valley Water District
Desert Water Agency
Honorable Members, County of Riverside Legislative Delegation

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
2/12/2026	Event Attended	EO Legislative Team, virtual meeting. Briefed about the federal appropriations process, how to apply for funding, and what to expect for Fiscal Year 2027. Overview of Congressionally Directing Spending, Programmatic Funding, and how to secure funding for important projects located in the state of California.		Sen. Alex Padilla (D-CA), Sen. Adam Schiff (D-CA)
5/27/2026	Lobby Day- DC	Housing and Workforce Solutions in DC for the National Coalition for Homeless Veterans [May 27-29, 2026]. Attendees: Gina Marasco and Jasmin Sanchez The conference brings together service providers, federal partners, advocates, researchers, and other stakeholders from across the country for several days of learning, collaboration, and information sharing focused on advancing solutions to end veteran homelessness.		President Donald Trump
4/22/2026	Lobby Day- DC	Department of Social Services in Washington, DC for Urban Child Welfare Leaders Convening [April 22-24, 2026]. Attendee: Bridgette Hernandez.		President Donald Trump
3/11/2026	Lobby Day- DC	Housing and Workforce Solutions in Washington, DC for the 2026 National Network for Youth: National Summit on Youth Homelessness & Hill Day [March 11-14, 2026] Attendees: Mariel Sarmiento, Program Specialist II, Clarice Banda, Administrative Services Assistant (TAP) for the Youth Advisory Board (YAB) team, Tori Stephens, YAB Member, Savannah Brown, YAB Member, Eveny Felix, YAB Member.		President Donald Trump
2/24/2026	Lobby Day- DC	BOS D2 and EO Legislative Team in DC for the NACO Legislative Conference attended a meeting with California's US Senators to disucss county priorities.		Sen. Alex Padilla (D-CA), Sen. Adam Schiff (D-CA)
2/23/2026	Lobby Day- DC	EO Legislative Team met with staff to discuss RivCo's Congressionally Directed Spending funding requests.		Rep. Darrell Issa (R-CA-48)
2/23/2026	Lobby Day- DC	EO Legislative Team met with staff to discuss RivCo's Congressionally Directed Spending funding requests.		Rep. Young Kim (R-CA-40)
2/23/2026	Lobby Day- DC	EO Legislative Team met with staff to discuss RivCo's Congressionally Directed Spending funding requests.		Rep. Raul Ruiz (D-CA-25)
2/23/2026	Lobby Day- DC	EO Legislative Team met with staff to discuss RivCo's Congressionally Directed Spending funding requests.		Rep. Jay Obernolte (R-CA-23)

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
1/27/2026	Lobby Day- DC	DCSS in DC for Ensuring Children Receive Support Act. Attendee: Nicole Windom-Hurd, Director of DCSS. Discussed the Ensuring Children Receive Support Act. The bill requires the State Department to revoke a previously issued passport if the individual owes more than 2.5k in child support. CalCSA supports this bill.	H.R. 6903: Ensuring Children Receive Support Act	Rep. Jimmy Panetta (D-CA-19), Rep. Beth Van Duyne (R-TX-24)
5/19/2026	Lobby Day-SAC	Department of Public Social Services in Sacramento for CSAC Legislative Conference [May 19-22, 2026]. Attendee: Leah Sams.		Governor Gavin Newsom (CA)
4/28/2026	Lobby Day-SAC	Department of Public Social Services in Sacramento for Linkages Building Bridges for Families [April 28-29, 2026]. Attendees: Colette Crawford, Ruben Rangel, Michelle Wohl, Vivian Chen, Felix Minjarez, Erika Pena Building Bridges for Families: Linkages 2026 Convening brings together Linkages partners from across the state for a day and a half of engaging programming, shared learning, and meaningful connection. The convening will feature workshops on key topics, including Linkages 2.0, prevention screening, CalWORKs transformation, policy and evaluation tools, sustainability, communication strategies, and emerging Linkages populations. Attendees will have ample time to network, exchange ideas, and learn from peers, with a Networking Reception on Tuesday evening to reconnect with colleagues and build new relationships.		Governor Gavin Newsom (CA)
4/21/2026	Lobby Day-SAC	Office on Aging in Sacramento for the 211 Disaster Ready and Resilient Conference [April 24-23, 2026]. Attendee: Rachelle Roman, Director		Governor Gavin Newsom (CA)
3/24/2026	Lobby Day-SAC	Department of Public Social Services in Sacramento at 2026 Advocacy in Action Conference. Attendees: Charity Douglas, Julissa Castillo, and Leah Sams.		Governor Gavin Newsom (CA)
3/18/2026	Lobby Day-SAC	Housing and Workforce Solutions in Sacramento for the Housing California Annual Conference. [March 18-20, 2026]. Attendee: Mike Walsh	A.B.2295: Regional housing need: affordable housing.	Governor Gavin Newsom (CA)
3/17/2026	Lobby Day-SAC	Office of Economic Development in Sacramento for Small Business Development Center (SBDC) Leadership meeting [March 17-19, 2026]. Attendance: Suzanne Holland, Director.		Governor Gavin Newsom (CA)

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
3/17/2026	Lobby Day-SAC	Department of Public Social Services in Sacramento attended the 2026 Annual Housing California Conference [March 18-19, 2026]. Attendees: Linda Salas & Grace Belluscio.		Governor Gavin Newsom (CA)
3/9/2026	Lobby Day-SAC	Department of Child Support Services in Sacramento for the Policy Symposium, Legislative Day, and CalCSA Membership meeting [March 9-12, 2026]. Attendee: Nicole Windom-Hurd, DCSS Director		Governor Gavin Newsom (CA)
2/19/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. Patrick Ahrens (D-CA-026)
2/19/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. Cecilia Aguiar-Curry (D-CA-004)
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. Alexandra "Ali" Macedo (R-CA-033)
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. Chris Ward (D-CA-078), Barbara Sanford - Former Fellow

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. Laurie Davies (R-CA-074)
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.		CA Assemb. Corey Jackson (D-CA-060)
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. John Harabedian (D-CA-041)
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. Tom Lackey (R-CA-034)
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Sen. Kelly Seyarto (R-CA-032)
2/18/2026	Lobby Day-SAC	EO Legislative team in Sacramento for Southwest Elected Leaders Collaborative Advocacy Day.		CA Assemb. Juan Carrillo (D-CA-039)
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. Kate Sanchez (R-CA-071)

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	Farra Bracht - Chief Consultant (House Transportation)
2/18/2026	Lobby Day-SAC	EO Legislative Team attended Sacramento Lobby Day with the Southwest Elected Leaders Collaborative.	A.B.2307: Transportation: traffic signal synchronization pilot program: Western Riverside Council of Governments.	CA Assemb. LaShae Sharp-Collins (D-CA-079)
2/11/2026	Lobby Day-SAC	Executive Office Communications and Budget Team in Sacramento for CSAC Innovation Awards and State Capitol Tour. Attendees: Brooke Federico, Yaoska Machado, Arianne Murphy, Cesar Bernal, and Victor Aguiree.		CA Assemb. Leticia Castillo (R-CA-058)
2/8/2026	Lobby Day-SAC	Veterans Services in Sacramento for the 2026 CACVSO Winter Training Conference from [February 8 -13, 2026] Attendees: Adam French, Ralph Duarte, and James Caraballo. CACVSO attended lobby day to advocate for additional funding for CVSOs.	S.B.694: Deceptive practices: service members and veterans.	Governor Gavin Newsom (CA)
2/2/2026	Lobby Day-SAC	Agricultural Commissioner's Office in Sacramento for New Commissioner Orientation Program. Attendee: Delia Cioc, Ag Comissioner. CA Agricultural Commissioner's and Sealers Association (CACASA) New Commissioner Orientation Program to learn about the State's pesticide regulations, Food and Agriculture updates, including plant health and pest prevention, disease control, and inspection services.		Governor Gavin Newsom (CA)

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
2/23/2026	Meeting	Palo Verde Healthcare District Legislative Delegation update meeting.		Governor Gavin Newsom (CA), Sen. Alex Padilla (D-CA), Rep. Raul Ruiz (D-CA-25), CA Sen. Steve Padilla (D-CA-018), CA Assemb. Jeff Gonzalez (R-CA-036)
2/23/2026	Meeting	Veterans Affairs met virtually with the Governor's legislative team to advocate for additional funding for CVSOs. Attendees: Adam French, Interim Director, Veterans Affairs	S.B.694: Deceptive practices: service members and veterans.	Governor Gavin Newsom (CA)
2/18/2026	Meeting	Palo Verde Healthcare District Legislative Delegation update meeting.		Governor Gavin Newsom (CA), Sen. Alex Padilla (D-CA), Rep. Raul Ruiz (D-CA-25), CA Sen. Steve Padilla (D-CA-018), CA Assemb. Jeff Gonzalez (R-CA-036)
2/17/2026	Meeting	RivCo annual meet and greet with Congressman Ken Calvert, district, and capitol staff. Attendees: D2 and Executive Management Team.		Rep. Ken Calvert (R-CA-41)
2/11/2026	Meeting	D4 hosted a virtual meeting to update stakeholders on the HWY 74 Truck Traffic Study.	A.B.1145: State highways: safety: State Highway Route 74: report.	CA Assemb. Greg Wallis (R-CA-047), CA Assemb. Jeff Gonzalez (R-CA-036)
2/9/2026	Meeting	EO Executive Management met with Senator Alex Padilla's staff. Attendees: James Schwab, State Director for Senator Alex Padilla and Silvia Ruelas-Chulak, Field Representative. Discussed RivCo legislative priorites, H.R. 1 Implemenation, and federal advocacy efforts.	H.R. 1: An act to provide for reconciliation pursuant to title II of H. Con. Res. 14.	Sen. Alex Padilla (D-CA)

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
1/15/2026	Meeting	EO Legislative Team in RivCo provided a brief overview of H.R. 1 impacts and discussed potential legislative solutions.		CA Sen. Sabrina Cervantes (D-CA-031), CA Assemb. Greg Wallis (R-CA-047), CA Sen. Rosilicie Ochoa Bogh (R-CA-019), CA Sen. Eloise Reyes (D-CA-029), CA Sen. Steve Padilla (D-CA-018), CA Assemb. Juan Carrillo (D-CA-039), CA Assemb. Jeff Gonzalez (R-CA-036), CA Sen. Kelly Seyarto (R-CA-032), CA Assemb. Kate Sanchez (R-CA-071), CA Assemb. Robert Garcia (D-CA-050), CA Assemb. Natasha Johnson (R-CA-063)
1/9/2026	Meeting	EO Legislative Team in RivCo provided a brief overview of H.R. 1 impacts and discussed potential legislative solutions.		CA Assemb. Leticia Castillo (R-CA-058)
1/5/2026	Meeting	EO legislative team discussed IE Caucus, legislative bill proposals, and AB 98 implementation.		CA Assemb. Juan Carrillo (D-CA-039)
1/5/2026	Meeting	EO Legislative Team in RivCo provided a brief overview of H.R. 1 impacts and discussed potential legislative solutions.		CA Assemb. Jeff Gonzalez (R-CA-036)
1/5/2026	Meeting	EO Legislative Team in RivCo provided a brief overview of H.R. 1 impacts and discussed potential legislative solutions.		CA Assemb. Greg Wallis (R-CA-047)
1/5/2026	Meeting	EO Legislative Team in RivCo provided a brief overview of H.R. 1 impacts and discussed potential legislative solutions.		CA Assemb. Corey Jackson (D-CA-060)
1/5/2026	Meeting	EO Legislative Team in RivCo provided a brief overview of H.R. 1 impacts and discussed potential legislative solutions.		CA Sen. Rosilicie Ochoa Bogh (R-CA-019)
1/5/2026	Meeting	EO Legislative Team in RivCo provided a brief overview of H.R. 1 impacts and discussed potential legislative solutions.		CA Sen. Steve Padilla (D-CA-018)
1/5/2026	Meeting	EO Legislative Team in RivCo provided a brief overview of H.R. 1 impacts and discussed potential legislative solutions.		CA Sen. Kelly Seyarto (R-CA-032)
1/5/2026	Meeting	EO Legislative Team met with Governor's Office to discuss Blythe, Palo Verde Hospital, and Veterans Services. Attendees: Skye Connors, SoCal Regional Coordinator, and Zach Bunshaft, incoming SoCal Regional Director.	S.B.694: Deceptive practices: service members and veterans.	Governor Gavin Newsom (CA)

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
2/17/2026	Testimony	Housing Workforce Solutions in Sacramento for Homeless Housing, Assistance and Prevention (HHAP) Hearing [February 17-18, 2026]. Attendee: Heidi Marshall, HWS Director. Heidi Marshall testified at Budget Subcommittee No. 7 on Accountability and Oversight regarding Homeless Housing and Prevention Program Funding Accountability (HHAP). The panel focused on the improved accountability provisions within the HHAP program, evaluated their effectiveness, and discussed additional accountability measures to ensure that critical state funding is working to reduce the number of people experiencing homelessness in California.		CA Assemb. Sharon Quirk-Silva (D-CA-067), CA Assemb. Blanca Pacheco (D-CA-064), CA Assemb. Juan Carrillo (D-CA-039), CA Assemb. Jesse Gabriel (D-CA-046), CA Assemb. Diane Dixon (R-CA-072), CA Assemb. Jessica Caloza (D-CA-052), CA Assemb. David Tangipa (R-CA-008), CA Assemb. Nicholas "Nick" Schultz (D-CA-044)

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April 14, 2026

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

RE: SB 926 (Strickland) Public safety: Funding of Proposition 36 Act.
As amended April 6, 2026 – SUPPORT
Set to be heard in the Senate Public Safety Committee on April 21, 2026

Dear Senator Arreguín,

On behalf of California's 58 counties, the California State Association of Counties (CSAC) writes in support of Senate Bill (SB) 926, an urgency measure, which would establish the California Public Safety Services Support Fund. Upon appropriation of funds from the Legislature, this measure would provide $400 million in funding for implementation of Proposition 36 in fiscal year 2026-27, to be administered via an equitable grant program by the Board of State and Community Corrections (BSCC). Additionally, the bill proposes an annual allocation from the state General Fund to the California Public Safety Services Support Fund, to be included in the Governor's January budget proposal at an amount sufficient to fully fund the continued implementation of the proposition.

As political subdivisions of the state, counties are responsible for the delivery of an expansive range of essential services in all communities across California. Critically, this responsibility extends to the provision of services, programs, and treatment required under Proposition 36. Broadly speaking, the initiative increased penalties for certain drug and theft offenses by repealing aspects of Proposition 47 (2014), and it established a new treatment-mandated felony, affording individuals faced with specified drug offenses the opportunity to enter treatment in lieu of incarceration. To be clear, county entities are the primary implementers of Proposition 36 – be it county sheriff deputies making arrests and overseeing individuals in local detention facilities, behavioral health departments conducting court-ordered evaluations and delivering individualized treatment for those suffering from substance use disorder or a serious mental illness, county probation officers providing assessments, pretrial services, and supervision, and other impacted county stakeholders that deliver necessary services. SB 926 supports this critical workforce by requiring a minimum level of funding for counties to meet the intent of Proposition 36 and the will of California voters who overwhelmingly approved the ballot initiative.

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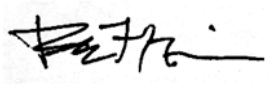
The Judicial Council of California's annual implementation report concluded that filings for Proposition 36 charges have significantly impacted the courts and the broader criminal justice system, totaling nearly 20,000 felony drug cases and roughly 15,500 felony theft cases in the first year alone. This expanded population and increased demand for services adds to the strain on already overloaded county departments, presenting substantial concerns across the larger county eco system. Most notably, the lack of state funding for Proposition 36 implementation – at a time when H.R. 1 is anticipated to shift federal safety net costs to states and counties, amassing up to $9.5 billion per year for counties alone – will have a devastating effect on Californians statewide. If forced to absorb costs from H.R. 1, every county service will face crippling cuts, including those provided by public safety and behavioral health departments, further impeding the effective implementation of Proposition 36.

For the reasons mentioned above, CSAC is pleased to support SB 926 and respectfully requests your AYE vote. Please do not hesitate to contact me with any questions at rmorimune@counties.org.

Sincerely,



Ryan Morimune
CSAC Senior Legislative Advocate
rmorimune@counties.org

CC: Members and Consultants, Senate Public Safety Committee
Eric Csizmar, Senate Republican Caucus

April 10, 2026

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

RE: Assembly Bill 2605 (Arambula) – OPPOSE UNLESS AMENDED
As Amended April 8, 2026

Dear Assemblymember Carrillo:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Urban Counties of California (UCC), we must regretfully oppose Assembly Bill 2605 (Arambula) unless amended to include a full and ongoing state appropriation to support its implementation. This bill would create new reporting requirements for counties in relation to public defense services.

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. 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 one of only four states that do not provide full or partial funding to counties for the delivery of this constitutionally mandated service. Counties, particularly small and rural counties, simply cannot absorb additional ongoing state-mandated costs without state funding.

AB 2605 would impose new reporting requirements on counties regarding the type of public defense system utilized, detailed information on case assignments, budgeting and expenditures, employment data, and case management data, creating additional administrative burdens without providing the necessary resources to support compliance. While data is critical in evaluating the efficacy of any program or system, these new requirements would divert limited local resources away from essential county services, including the provision of constitutionally mandated legal representation.

Local government budgets are increasingly constrained by a combination of effectively static or decreasing local revenues and ever-rising local costs and unfunded state mandates. Most notably, counties are also facing a looming fiscal crisis associated

with the implementation of H.R. 1, which is expected to increase demands on county safety net programs and indigent health services in the tune of up to $9.5 billion annually for counties alone. H.R. 1 and other state and federal policy decisions, over which local governments have no control, are crippling the ability of counties to continue to deliver high quality services on behalf of the state and federal government. While a portion of these costs may be recovered through the Commission on State Mandates, the process is lengthy, requires significant staff time and resources, and if approved by the commission, counties are rarely funded at an adequate level. As such, we respectfully request this bill be amended to include an appropriation of funds sufficient to cover the full costs that local governments will incur for implementation.

For these reasons, RCRC, CSAC, and UCC must oppose AB 2605 as currently drafted. If you should have any questions, please do not hesitate to contact us.

Sincerely,

SARAH DUKETT
Rural County Representatives of California
Senior Policy Advocate
sdukett@rcrcnet.org

RYAN MORIMUNE
California State Association of Counties
Senior Legislative Advocate
rmorimune@counties.org

JOSH GAUGER
Urban Counties of California
Legislative Representative
jdg@hbeadvocacy.com

cc: The Honorable Joaquin Arambula, Member of the California State Assembly
Members, Assembly Local Government Committee
Angela Mapp, Chief Consultant, Assembly Local Government Committee
Tobias Wolken, Consultant, Assembly Republican Caucus

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April 17, 2026

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

RE: AB 1559 (Calderon) Residential property insurance images.
As amended on April 13, 2026 - SUPPORT
To be heard in the Assembly Committee on Privacy and Consumer Protection on April 21, 2026

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of AB 1559 (Calderon).

This bill would require an insurer to notify a residential policyholder of whether aerial images may be taken or obtained of their property and would require the insurer to provide any such images upon request. This bill would also prohibit an insurer from terminating coverage based on an aerial image taken more than 180 days prior to notice of termination.

The presence of a competitive, robust, and fair insurance marketplace is an essential component of wildfire readiness and response. We support measures that allow for consumers to have the best possible information about what goes into the assessment of risk scores that affect affordability and accessibility of insurance policies. By making this information readily available, we can more effectively align wildfire risk mitigation efforts with market-based incentives, allowing for residents to recover more quickly from fires and for the proper management of risk in new development.

This bill is a straightforward, reasonable mechanism to provide consumers with more information to guide their risk assessment and mitigation decisions, and for more alignment between wildfire preparedness efforts and market forces.

For these reasons, we are supporting AB 1559 (Calderon). If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

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Past President Jeff Griffiths, Inyo County
CEO Graham Knaus

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

CC: The Honorable Lisa Calderon, Member of the California State Assembly
Members, Assembly Committee on Privacy and Consumer Protection

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April 17, 2026

The Honorable Isaac Bryan
Chair, Assembly Committee on Natural Resources
1020 N Street, Room 164
Sacramento, CA 95814

RE: AB 1577 (Bauer-Kahan) Data centers: reporting.
As amended on April 13, 2026 – SUPPORT
To be heard in the Assembly Natural Resources Committee on April 20, 2026

Dear Chair Bryan,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we are pleased to **support** Assembly Bill 1577 which would establish reporting requirements for data centers to improve transparency around their energy and water use.

While data centers play an important role in supporting California's digital economy, they can also place significant demands on local energy systems and water supplies. AB 1577 provides a critical tool to help counties better understand and plan for these impacts by requiring standardized reporting to the California Energy Commission (CEC) on key metrics such as electricity consumption and water usage. The bill would further direct the California Energy Commission (CEC) to incorporate an analysis of data center electricity demand trends into its Integrated Energy Policy Report beginning in 2029.

AB 1577 will equip local governments with the data needed to make informed decisions about project siting, infrastructure investments, and long-term sustainability planning. This information is particularly important as counties work to meet state climate goals, manage constrained water resources, and ensure reliable energy availability for residents and businesses.

For these reasons, we are pleased to **support** AB 1577. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

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Sincerely,

Jordan Wells
Legislative Advocate
California State Association of Counties

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April 17, 2026

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

RE: AB 1699 (Rogers) Good Fire Act: Prescribed Fire Liability Pilot Program: burn bosses: California Environmental Quality Act.
As introduced on February 3, 2026 – SUPPORT
To be heard in the Assembly Appropriations Committee on April 22, 2026

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we are pleased to **support** Assembly Bill 1699 which would establish the Good Fire Act.

Prescribed fire is a critical tool for reducing wildfire risk and improving forest health. Prescribed burns provide many significant benefits, including forest and range improvement, reduction of hazardous fuels, wildlife and ecosystem enhancement, and watershed management. Despite these benefits, one of the primary obstacles to increasing the use of prescribed and cultural fires in California is the difficulty of obtaining adequate liability coverage. CSAC supported SB 926 (Chapter 606, Statutes of 2022) which established the Prescribed Fire Liability Pilot Program and the Prescribed Fire Claims Fund until 2028 to increase the pace and scale of beneficial fire and cover certain losses arising from permitted prescribed burns by non-public entities. This was intended to encourage the greater use of beneficial fire by reducing financial risk, while also demonstrating that prescribed and cultural burning presents a relatively low-risk profile.

Permit delays, including compliance with the California Environmental Quality Act (CEQA), can have catastrophic consequences on proactively protecting communities and cities from wildfire impacts. In October 2025, Governor Newsom signed Executive Order N-35-25 directing interstate agency coordination to remove administrative and regulatory barriers to safely deploy beneficial fire projects more effectively during the critical weather window. AB 1699 largely codifies the provisions of this Executive Order and indefinitely extends the Prescribed Fire Liability Program and Prescribed Fire Claims Fund.

AB 1699 also requires burn bosses, individuals certified to conduct and execute contracts on prescribed burns, to be recertified at least every 3 years. Certified burn bosses would be

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authorized to review and approve controlled burn plans without the need for additional approval from CAL FIRE, which would allow for more streamlined locally managed fuel reduction projects.

For these reasons, we are pleased to **support** AB 1699. 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 Chris Rogers, Member of the California State Assembly
Members, Assembly Appropriations Committee

April 16, 2026

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

RE: AB 1812 (Aguiar-Curry) Solid waste: compostable products
As amended on March 23, 2026 – SUPPORT

Dear Chair Wicks,

The California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and League of California Cities (Cal Cities) are pleased to **support** Assembly Bill 1812 related to compostable products.

Local governments have been working in good faith to implement the sweeping requirements of SB 1383 (Chapter 395, Statutes of 2016) which mandates the collection and processing of organic waste at an unprecedented scale. Cities and counties have invested substantial public resources to establish new or expand existing collection programs, amend contracts, secure responsible end markets, educate residents and businesses, and conduct enforcement.

California's organics recycling system processes approximately 12 million tons of yard trimmings and food scraps annually, but this system depends on uncontaminated organic waste streams. These efforts are undermined when non-compostable materials enter the system. Plastic and "compostable plastic" contamination in the compost stream increases processing costs, degrades compost quality, leads to rejected loads and landfilling, and jeopardizes the ability to meet procurement requirements, threatening the viability of organic waste recycling programs and the markets that depend on high-quality finished compost. Removing contamination from composting streams already accounts for over 20% of compost production costs. Therefore, addressing problematic plastics and misleading "compostable" claims is essential to ensure that SB 1383 implementation remains feasible, cost-effective, and capable of delivering the environmental benefits the Legislature intended.

Previously, the State and local jurisdictions had little control over the design and labeling of "compostable plastics" products entering the stream of commerce that ultimately contaminate the organic waste systems they have invested heavily to develop. AB 1201 (Chapter 504, Statutes of 2021) sought to remedy this issue by setting standards for products to be able to be considered compostable. Under AB 1201, products labeled as "compostable" must meet multiple criteria: they must comply with USDA National Organic Program (NOP) standards for allowable compost feedstocks, pass recognized ASTM compostability tests, and be free of persistent contaminants such as PFAS, ensuring that certified compostable products are truly compatible with organic recycling systems and safe for end markets.

In August 2023, the Biodegradable Products Institute (BPI), a North American trade organization representing manufacturers of compostable products, petitioned NOP to allow certified "compostable plastics" in organic production. While this petition was under consideration, CalRecycle extended the implementation deadline for AB 1201 requirements from January 1, 2026 to June 30, 2027. In January 2026, the USDA National Organic Standards Board (NOSB) unanimously voted against adding broad classes of synthetic compostable materials to the National List of allowed compost feedstocks under the NOP. While the NOSB concluded that those products do not currently meet the criteria for organic labeling, it kept open the possibility for future review of individual substances on a case-by-case basis. As a result, compost that contains plastics of any kind, including "compostable" bioplastics, are not eligible to be labeled organic. Farmers purchase two-thirds of the compost produced in California and rely on NOP certification to guarantee quality and purity. Organic farmers rely on NOP certification to protect their status as Certified Organic growers.

Beyond the NOP requirements, compostable plastics generally do not fully decompose in California's composting facilities. While some bioplastics may meet ASTM standards, those ASTM standards do not reflect real world composting conditions and timeframes in California's facilities. Even if compostable plastics were able to fully decompose in California's compost facilities, the federal bar on labeling the end product as organic would eliminate much of the market for finished compost, thereby leaving public and private facilities awash in unwanted compost.

AB 1812 would preserve California's robust and renowned composting system from plastic pollution by keeping plastic contamination out of the organics recycling system and aligning consumer expectations with the realities of California's composting systems. The

bill makes clear that manufacturers should make all plastic items recyclable and focus on the use of plant fiber for compostable products.

AB 1812 is needed to align upstream product standards with downstream composting realities. By reducing problematic materials at the source and clarifying what can truly be composted in real-world facilities, the bill will help protect existing infrastructure investments, preserve agricultural and landscaping end markets, and ensure that compost produced from California's organic waste programs remains safe, usable, and marketable. Without these safeguards, contamination will continue to erode program effectiveness and place additional financial burdens on local ratepayers while jeopardizing the State's circular economy goals.

For these reasons, we are pleased to **support** AB 1812. If you have any questions, please contact Jordan Wells (CSAC) at jwells@counties.org, John Kennedy (RCRC) at jkennedy@rcrcnet.org, or Melissa Sparks-Kranz (Cal Cities) at msparkskranz@calcities.org.

Respectfully,

Jordan Wells
Legislative Advocate
California State
Association Of Counties

John Kennedy
Senior Policy Advocate
Rural County Representatives
of California

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

CC: The Honorable Cecilia Aguiar-Curry, Member of the California State Assembly
Members, Assembly Appropriations Committee

April 16, 2026

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

RE: AB 1934 (Bennett) State Fire Marshal: home hardening certification program implementation plan.
As amended on March 25, 2026 – SUPPORT

Dear Chair Wicks,

The California State Association of Counties (CSAC), League of California Cities (Cal Cities), and Rural County Representatives of California write in **support** of Assembly Bill 1934 (Bennett) regarding a home hardening certification program implementation plan.

AB 1934 would require the State Fire Marshal's Wildfire Mitigation Advisory Committee to develop an implementation plan for a home hardening certification program by January 1, 2028, and provide a report on its findings and recommendations. The implementation plan would identify home hardening measures, including defensible space, that can be voluntarily implemented during renovation and/or property improvement projects to substantially reduce the risk of loss during a fire and bring existing building stock into alignment with state building standards for wildland-urban interface (WUI) areas.

California local governments support the establishment of a statewide home hardening certification program and implementation plan because it would provide a clear, science□based standard for reducing wildfire risk to existing homes, strengthening community resilience while helping residents make informed investments in safety. A uniform certification would also improve eligibility for insurance incentives; however, property-level and communitywide wildfire risk mitigation efforts still need to be accounted for in insurance rates and formalized in an update to the Safer from Wildfires regulations. By lowering structure loss during wildfires, home hardening ultimately protects lives and reduces the long-term public costs of disaster response and recovery.

For these reasons, we are pleased to support AB 1934. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org, Jolena Voorhis (Cal Cities) at jvoorhis@calcities.org, or Staci Heaton (RCRC) at sheaton@rcrcnet.org.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

Jolena Voorhis
Legislative Advocate
League of California Cities

Staci Heaton
Senior Policy Advocate
Rural County Representatives of California

CC: The Honorable Steve Bennett, Member of the California State Assembly
Members, Assembly Appropriations Committee

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

April 17, 2026

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

RE: AB 2051 (Wicks) Public resources: Coastal Resilience Permitting Working Group.
As amended on March 25, 2026 - SUPPORT

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of AB 2051 (Wicks).

California's coast and bays are on the front lines of climate change. Sea level rise, storm surges, and increasingly frequent flooding threaten vulnerable communities, sensitive ecosystems, and critical infrastructure across the state. The Ocean Protection Council projects sea levels could rise by more than three feet by 2100 under likely scenarios, with even higher-end projections possible. In the San Francisco Bay Area alone, agencies estimate needing $110 billion by 2050 for climate resilience projects to protect people, habitats, and public infrastructure.

Delivering these resilience projects quickly and responsibly is essential. Unfortunately, California's current coastal permitting system is often fragmented and unpredictable, slowing urgently needed adaptation efforts and increasing costs, as illustrated by the California State Assembly Select Committee on Permitting Reform's final report.

AB 2051 takes a thoughtful and collaborative approach to addressing these challenges. The bill directs the California Natural Resources Agency to convene an interagency Coastal Resilience Permitting Working Group to identify administrative improvements and develop a clear roadmap for streamlining permitting for coastal resilience projects. Through stronger interagency coordination, standardized processes, workforce assessment, and recommendations for future legislative action, the bill seeks to accelerate resilience projects while upholding California's environmental protections.

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AB 2051 will help ensure that critical climate adaptation projects move forward at the scale and speed required to protect communities and ecosystems. For these reasons, we respectfully urge your support of AB 2051.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties
cdelgado@counties.org

CC: Members, Assembly Committee on Appropriations

April 13, 2026

The Honorable Tasha Boerner
Member, California State Assembly
1021 O Street, Room 4150
Sacramento, CA 95814

RE: Assembly Bill 2170 – Oppose
As Amended March 19, 2026

Dear Assembly Member Boerner:

On behalf of the Rural County Representatives of California (RCRC), League of California Cities (Cal Cities), and California State Association of Counties, we must regretfully oppose your Assembly Bill 2170 regarding the California Environmental Quality Act (CEQA).

Assembly Bill 2170 significantly expands CEQA to require preparation of an environmental impact report (EIR), mitigated negative declaration (MND), or negative declaration (ND) for the development, operation, or substantial modification/expansion of a project on land zoned to allow industrial uses and that is in or within ½ mile of an "overburdened community." AB 2170 also requires translation of a large number of CEQA notices and documents and imposes a new obligation for local agencies to have in-person oral translation services at public hearings. Together, these requirements impose significant burdens and costs on lead agencies and project proponents and expand litigation risk for those projects.

We support CEQA's core objectives of disclosure, informing the decision-making process, and mitigating a project's significant impacts on the environment. Unfortunately, CEQA is often used for non-environmental purposes to either extract concessions from project applicants, or by interested parties to stop a project altogether. All over California, a wide variety of projects are subject to endless delays and added costs by those who use CEQA for their own non-environmental ends. We fear that AB 2170 will increase CEQA costs, complexity, and litigation risks and provide another powerful tool for opponents to challenge and undermine projects.

AB 2170 imposes new obligations and legal risks for a broad universe of projects located in or near "overburdened communities"

For projects on property zoned to allow industrial uses and located in or within ½ mile of an "overburdened community," AB 2170 requires preparation of an EIR, MND, or ND. In doing so, AB 2170 precludes the use of CEQA exemptions and significantly increases project costs, complexity, and litigation risk.

AB 2170's "overburdened community" provision is not limited to parcels *zoned* industrial, but instead applies to any project on land *zoned to allow* industrial uses. Zoning varies from jurisdiction to jurisdiction, but some non-industrial zones *allow* industrial uses either as an allowed

use or with a minor conditional use permit. As such, this provision could apply to a broad universe of ordinary projects on lands zoned for industrial, agricultural, or even commercial uses, but where some universe of industrial uses are either "allowed" either by right or with a conditional use permit. Notably, this provision targets all "projects" on those lands, not just industrial projects. Further, the Legislature has long debated the necessary distance requirements for sensitive receptors near industrial areas in a variety of bills and ½ a mile is a far-reaching measure that would result in an extremely broad radius paired with this project definition. This imprecise drafting pulls within the sweep of AB 2170 any number of housing, commercial, business, or agricultural projects occurring on parcels where industrial uses are "allowed."

Furthermore, the scope of "overburdened community" is broad and includes not only CalEnviroScreen communities, but also broad swaths of unincorporated areas where the median household income is 80% or less than the statewide median household income. This latter trigger sweeps into the scope of the bill many unincorporated rural areas, as well as rural, incorporated cities. By increasing CEQA complexity and litigation risk, we fear that AB 2170 will disincentivize the location of projects away from those areas in greatest need of economic development and towards more affluent areas, thereby ossifying economic stagnation for those residents and their communities.

While AB 2170 could be read to only preclude the use of statutory CEQA exemptions (21080.1(a)(2)(B)), one could argue that the explicit requirement to prepare an EIR, MND, or ND in 21080.1.(a)(2)(A) also precludes local agencies from using categorical exemptions. Categorical exemptions were established for projects the state determined generally do not have a significant effect on the environment. The effect of these provisions is to require local agencies and developers to perform unnecessary environmental analyses; however, the real risk is that it changes the judicial standard of review for local decisions from the deferential "substantial evidence" standard which applies to notices of exemption to the far lower "fair argument" standard that applies for MNDs and NDs and which has been exploited by project opponents and NIMBYs to delay projects for years even when there is contrary evidence in the record that a project would not have a significant impact on the environment.

Because of the broad sweep of the bill, ambiguity, lack of a definition for types of projects impacted, and imprecise crafting, AB 2170 could preclude the use of statutory exemptions for the construction of farmworker housing on agricultural land if the local government allows some types of industrial activities to occur on those lands either as an allowed use or with a minor conditional use permit. Similarly, AB 2170 could preclude the use of a CEQA exemption when issuing a discretionary permit to replace a groundwater well on land zoned for agriculture but where an industrial use like a packing operation or processing facility is allowed either by right or with a conditional use permit.

Taken together, AB 2170 will increase CEQA cost and complexity for a large universe of projects in broad regions of the state and significantly increase CEQA litigation risk for projects that otherwise would have qualified for statutory or categorical CEQA exemptions.

AB 2170 creates significant new cost pressures and litigation risks by imposing broad written and oral translation requirements for all projects

AB 2170 requires a broad array of CEQA notices, summaries, and documents to be translated into "threshold languages," a term which is itself ambiguously crafted and departs from long-standing definitions. AB 2170 does not merely apply to CEQA notices - it also includes lengthy and highly-technical information contained in EIRs. Depending on the length of the

document and number of languages into which it must be translated, these costs could be considerable. Worse yet, there is substantial risk that opponents will argue an imprecise translation in a document precluded informed decision-making, which could result in the project approval being held up for several years while the case works it way through courts and any problems are remedied.

While these AB 2170 translation costs could be considerable, there are even greater costs and implementation challenges associated with AB 2170's requirement to provide oral translation at public hearings. These challenges will be even greater for communities with multiple threshold languages or in remote areas that lack access to translators. What happens if the translator fails to show up - must the meeting be postponed? Will inaccurate live translations fail to inform public participation?

Beyond the translation challenges posed by AB 2170, the bill also imposes new requirements regarding when and where public hearings on a project must be located. These could pose logistical challenges, especially for controversial projects with large numbers of individuals wishing to participate in the hearings.

AB 2170's savings clause for inaccurate translations is inadequate

Unfortunately, the savings clause contained in AB 2170 provides very little protection against litigation. It provides that "minor translation inaccuracies" *of a document* are not a basis for invalidating a public agency decision unless the error precluded informed decision making or public participation. This will simply lead to litigation about whether an inaccuracy was minor or precluded informed public participation. That simple claim could take years to resolve in court. Worse yet, there is NO protection afforded for inaccurate oral translation, or insulation from liability if an oral translator was unavailable. CEQA is litigious enough - local agencies should not be subject to challenges based upon the content or accuracy of translations required under AB 2170.

AB 2170 imposes substantial new costs on government agencies that cannot be recovered from project applicants

AB 2170 incorrectly states that no reimbursement is required because local agencies will be able to levy service charges, fees, or assessments to recover their costs. This is simply not true. *While local agencies may be able to recover some implementation costs where there is a project applicant, AB 2170 fails to recognize that many CEQA "projects" are undertaken by local agencies themselves and so will be unable to recover costs in those instances*. Even if a local agency can recover AB 2170 implementation costs when there is a project applicant, the bill will still result in significant cost increases (and litigation risks) for housing, energy, business, and other developers.

For these reasons, we must oppose AB 2170 but remain interested in discussing pathways for translating CEQA notices without creating additional litigation risk. If you should have any questions, please do not hesitate to contact us.

Sincerely,

JOHN KENNEDY
Rural County Representatives of California
Senior Policy Advocate
jkennedy@rcrcnet.org

CHARLES DELGADO
California State Association of Counties
Legislative Advocate
cdelgado@counties.org

MELISSA SPARKS-KRANZ
League of California Cities
Legislative Advocate, Environmental Quality
msparkskranz@calcities.org

JEAN HURST
Urban Counties of California
Legislative Representative
jkh@hbeadvocacy.com

cc: The Honorable Isaac Bryan, Chair, Assembly Natural Resources Committee
Members of the Assembly Natural Resources Committee
Lawrence Lingbloom, Chief Consultant, Assembly Natural Resources Committee
John Fitzpatrick, Consultant, Assembly Republican Caucus

April 16, 2026

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

RE: Assembly Bill 2569 (Hart) – OPPOSE
As Introduced February 20, 2026

Dear Assembly Member Wicks:

On behalf of the Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), and the California State Association of Counties (CSAC), we must regretfully oppose Assembly Bill 2569 (Hart) regarding the California Environmental Quality Act (CEQA).

Assembly Bill 2569 significantly expands CEQA to require consideration and mitigation of the environment's impact on a project. In particular, it expands CEQA to require consideration and mitigation of a direct or indirect exposure of people to a substantial existing or reasonably foreseeable natural hazard or adverse condition of the environment. The bill also requires an environmental impact report to evaluate and mitigate any significant effects that may result from locating the project near, or attracting people to, existing or reasonably foreseeable natural hazards or adverse environmental conditions.

RCRC supports CEQA's core objectives of disclosure, informing the decision-making process, and mitigating a project's significant impacts on the environment. Unfortunately, CEQA is often used for non-environmental purposes to either extract concessions from project applicants or by interested parties to stop a project altogether. All over California, a wide variety of critical projects are subject to endless delays and added costs by those who use CEQA for their own, non-environmental ends. We would welcome the opportunity to discuss how AB 2569 may be able to address some of these existing problems as a precursor.

CEQA challenges impact a wide variety of projects, ranging from food banks to childcare centers to planned parenthood facilities. Other notable challenges have attacked housing, student housing, affordable housing for veterans, etc. CEQA litigation can delay projects for years and add millions of dollars in added costs for the project

proponent. Because of the low bar for bringing and sustaining an action under the "fair argument" standard, even the threat of CEQA litigation can force project developers and lead agencies into much more costly and time-intensive analyses merely intended to bullet-proof the record.

Despite its noble intent, CEQA has become a vital tool for NIMBY groups and project opponents to fight housing, competitors, and essential facilities. In light of the highly litigious world that has developed around CEQA and the way in which it abused, we must strongly oppose AB 2569 because we believe it will merely be used as another tool to oppose and kill vital projects in our communities.

Local governments are vested with the authority and responsibility to make land use decisions within their jurisdictions. As part of that decision-making process, local governments consider and balance competing land uses and risks posed by (and to) the projects under consideration. This process is separate and independent from the CEQA review process, which was designed and intended to reduce a project's impact on the environment. Efforts to address these problems have almost all been thwarted by those who stand to benefit from CEQA's complexity and deference to petitioners. As a result of this stalemate, and to address many of the significant legal, procedural, and economic problems associated with CEQA, many recent bills have sought to eliminate local discretion for particular types of projects – especially in the housing context.

We must regretfully oppose AB 2569 because we fear that it will provide a powerful tool that can be exploited by a wide variety of interest groups to fight housing, critical infrastructure, economic development, and recreational projects. Considering that most of the state has been identified as being at heightened risk for fire, floods, earthquakes, or sea level rise, AB 2569 will further erode the ability for many local governments to meet their Regional Housing Needs Allocation (RHNA) targets. While some of the housing streamlining bills enable developers to bypass CEQA, they do not apply to all areas of the state and are often contingent upon satisfaction of labor standards that are unachievable in many rural communities. As such, AB 2569 creates an even greater risk for housing projects in both rural and urban areas of the state. AB 2569 could also be used to fight critical roads projects to create or expand egress opportunities for existing communities. Because the bill now focuses CEQA on the environment's impact on a project, we fear that this bill could also be exploited to kill projects that are located near manufacturing or industrial areas.

Finally, we believe that AB 2569 is also impractical from a mitigation perspective. It is fairly simple and straightforward (albeit potentially expensive) to mitigate a project's impact on the environment because the means of reducing impacts are within the control of the project developer. On the other hand, having to mitigate the environment's impact on the project, as required by this bill, will be incredibly complex and potentially unachievable. How will a housing development mitigate against the impacts of a manufacturing facility or landfill located half a mile away? How will a park or recreation

project in a high fire risk area mitigate against attracting people to those areas? These are core concerns that must be addressed.

While we must regretfully oppose AB 2569, we believe there is merit to the underlying intent to improve decision-making, convey important information, and improve the safety of our communities. If CEQA was not so prone to misuse, we would be ready to discuss how to better integrate these concepts into CEQA. However, unless and until significant changes are made to CEQA, including fixes to the fair argument standard, document dumping, the administrative record, and timeliness/finality of decisions, we must continue to oppose expanding CEQA as contemplated in AB 2569.

For these reasons, RCRC, Cal Cities, and CSAC must oppose AB 2569 as currently drafted. If you should have any questions, please do not hesitate to contact us.

Sincerely,

JOHN KENNEDY
Senior Policy Advocate
Rural County Representatives of California
jkennedy@rcrcnet.org

MELISSA SPARKS-KRANZ
Legislative Advocate
League of California Cities
msparkskranz@calcities.org

CHARLES DELGADO
Legislative Advocate
California State Association of Counties
cdelgado@counties.org

cc: The Honorable Gregg Hart, Member of the California State Assembly
Members of the Assembly Appropriations Committee
Nikita Koraddi, Principal Consultant, Assembly Appropriations Committee
John Fitzpatrick, Consultant, Assembly Republican Caucus

April 13, 2026

The Honorable Rebecca Bauer-Kahan
Member, California State Assembly
1021 O Street, Suite 5210
Sacramento, CA 95814

RE: **AB 2724 (Bauer-Kahan) Catastrophe Modeling: distressed areas.**
Notice of SUPPORT *(As Introduced 2/20/2026)*

Dear Assemblymember Bauer-Kahan,

On behalf of the League of California Cities (Cal Cities), the California State Association of Counties (CSAC) and the Rural County Representatives of California (RCRC) we are pleased to support your bill, **AB 2724**, which would require the Insurance Commissioner to change the definition of distressed areas under the Catastrophe Modeling regulations. This proposed change would ensure that many of the communities are affected by the high insurance prices, and the lack of coverage can be included in the regulations.

Under the Catastrophe Modeling Regulations adopted in January 2025, insurance companies are required to offer insurance to 85% of their statewide market share in distressed areas identified by the Insurance Commissioner. Distressed areas are defined by zip codes that have 15% or more property owners enrolled in the FAIR Plan and counties that have 20% or more properties that are in a high-risk area.

During the public comment period of the Catastrophe Modeling, our organizations noted our concern with the 15% statistic and noted that even with this requirement it was unclear whether insurance companies would provide coverage to all communities experiencing high insurance policies or the ability to obtain coverage.

This bill would change the existing definition of distressed areas to include many communities that are still experiencing trouble obtaining affordable insurance by lowering the 15% standard to 10%.

For these reasons, we are pleased to support AB 2724. Please do not hesitate to contact Staci Heaton (RCRC) at sheaton@rcrcnet.org, Charles Delgado(CSAC) at cdelgado@counties.org or Jolena Voorhis (Cal Cities) at jvoorhis@calcities.org with any questions.

Sincerely,

Staci Heaton
Senior Policy Advocate
Rural County Representatives of California

Chales Delgado
Legislative Advocate
California State Association of Counties

Jolena Voorhis
Legislative Advocate
League of California Cities

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April 17, 2026

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

RE: AB 2739 (Soria) Water: affordability and system stabilization.
As amended April 6, 2026 – Notice of SUPPORT

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of AB 2739 (Soria).

This bill would establish the Water Affordability and System Stabilization Fund and the Community Water Affordability Program, which are important steps in ensuring that local jurisdictions have the necessary resources to ensure access to clean, affordable drinking water for all residents.

Water affordability and system stability are increasingly interconnected challenges across California. Rising costs associated with infrastructure modernization, climate resilience, regulatory compliance, and energy continue to place pressure on water systems and the communities they serve, especially households living at or near poverty.

AB 2739 proposes a durable, California-based solution by addressing affordability at the household, system, and community levels. The Act advances a sustainable funding solution to support a statewide Low-Income Rate Assistance (LIRA) program for water while also supporting strategic investments that stabilize water systems and help reduce cost pressures before they are passed on to ratepayers.

This bill's proposed funding structure provides predictable, long-term resources without placing new burdens on local governments or water ratepayers. This approach strengthens water planning, reduces reliance on episodic bond measures, and enhances statewide resilience while preserving local decision-making. Further, we support the commitment of the bill sponsors to create a viable, sustainable funding source that does not include any new taxes or fees.

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This bill represents an important step forward in advancing the Human Right to Water by supporting vulnerable households and strengthening the public water systems that serve communities across the state.

For the reasons stated above, CSAC is pleased to support this effort, and we applaud your leadership in advancing this important initiative.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties
cdelgado@counties.org

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

April 17, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
California State Capitol, Room 412
Sacramento, CA 95814

RE: SB 872 (McNerney) Delta Levees and Canal Subsidence Fund.
As Amended March 14, 2026 – SUPPORT
To be heard in the Senate Appropriations Committee on April 27, 2026

Dear Chair Cervantes,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of SB 872 (McNerney).

This bill would establish the Delta Levees and Canal Subsidence Fund, which would combine general funds, bond funds, and Greenhouse Gas Reduction Fund allocations to allow for the Secretary of Natural Resources to make investments in restoration of water conveyance infrastructure affected by subsidence, and improvement of Delta levees.

Large-scale investment in California's water infrastructure is vitally important. This commitment to water supply for all beneficial uses, safeguarding the environment, protecting life and property from flood disasters, and ensuring community drinking water supplies, has been demonstrated by the Legislature and the Administration consistently through prior budget allocations and through measures like Proposition 4. The scale of the challenges facing California's water future, however, means that there is still much work to be done.

The recent changes to federal funding policies and the current year's budget deficit have underscored the need for creative solutions to our water challenges. Despite current uncertainties in the state financial position, the urgent need to adapt our water infrastructure to the realities of the post-climate change world remains.

This bill is an ambitious solution to two critical areas of need in our water infrastructure: conveyance and Delta flood protection. Aqueducts, channels, and other infrastructure that our water managers rely on have been compromised by land subsidence from decades of over pumping of groundwater, a situation that is only recently being addressed by the

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implementation of the Sustainable Groundwater Management Act. Without this infrastructure, deliveries of water to farmers, communities, businesses, and all other users are threatened. A recent DWR study characterizes the impact of subsidence on water infrastructure to be in the billions of dollars[1].

Meanwhile, the Sacramento-San Joaquin Delta, where the risk posed by an aging system of 1,100 miles of levees threatens not only local communities with catastrophic flooding, but also the reliability of the state's primary water conveyance system, will require at least $3.2 billion in repairs to these levees by 2050, with $1 billion of that amount needed in the next five years, according to the Delta Stewardship Council and DWR[2].

This bill addresses two areas of critical need, in a manner that respects the needs of Delta counties and local communities and also results in environmental co-benefits. CSAC applauds the timelines and scale of this much-needed, ambitious measure.

For these reasons, we are supporting SB 872 (McNerney). If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

CC: Members, Senate Committee on Appropriations
The Honorable Jerry McNerney, California State Senate

[1] https://water.ca.gov/-/media/DWR-Website/Web-Pages/News-Releases/Files/251015_SJV-Conveyance-Study_layout_v7.pdf

[2] https://calmatters.org/environment/water/2025/04/delta-levees-risk-of-floods-repairs-cost-3-billion/

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1100 K Street, Suite 101 | Sacramento, CA 95814

April 14, 2026

The Honorable Henry Stern
Chair, Senate Committee on Emergency Management
1020 N Street, Suite 549
Sacramento, CA 95814

RE: SB 894 (Allen) Wildfire resiliency: financial assistance.
As amended on April 9, 2026 – SUPPORT
To be heard in Senate Emergency Management Committee on April 21, 2026

Dear Chair Stern,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we write in **support** of Senate Bill 894 regarding wildfire resiliency financial assistance.

Numerous studies have shown that retrofitting homes to make them more resistant to the impacts of wildfire, known as home hardening, is an effective way to reduce risk of ignition in the event of a high severity wildfire. This is particularly effective if home hardening efforts are implemented communitywide and to the highest standards. These retrofits are costly, however, and it can cost tens of thousands of dollars to harden an existing home to the most fire-resistant standard: potentially $30,000-40,000 to fully fire harden an older home.

Creation and maintenance of defensible space are key, but can pose significant financial challenges, especially as many homeowners in forested areas are low-income, fixed-income, or elderly. We must find ways to help homeowners pay for these vital improvements because they will have transformative benefits for those living in high fire risk areas. One solution is providing deferred repayment and forgivable loans and grants to help low-income Californians harden their homes and create defensible space.

SB 894 would establish the California Wildfire Resilience Loan Program and would require the California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA) to administer the program to provide financial assistance for projects and activities to reduce wildfire-related risks and losses, including home hardening and defensible space improvements. The funds could be used for home hardening, including

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ignition-resistant features, vegetation management, defensible space treatments, smoke mitigation retrofits, and other risk reduction measures. Participants could include public and private partners, including utilities, insurers, nonprofit organizations, philanthropic entities, and the federal government, where the participation advances public safety, market stability, and resilience objectives.

For these reasons, we are pleased to **support** SB 894. 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

CC: The Honorable Benjamin Allen, Member, California State Assembly
Members and Consultants, Senate Emergency Management Committee

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

April 17, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: SB 1001 (Archuleta) Local agency, corporation, or mutual water company: personnel access: Personal Identity Verification-Interoperable.
As amended on March 17, 2026 –Notice of SUPPORT
To be heard in the Senate Appropriations Committee on April 27, 2026

Dear Chair Cervantes,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of SB 1001 (Archuleta).

This bill would require the California Governor's Office of Emergency Services (CalOES) to develop identity verification cards for local water utility workers, in order to allow them to access areas affected by floods, storms, fires, earthquakes, or other disasters and restore affected water infrastructure. The bill would establish authorities and guidance for law enforcement officers to allow water utility workers carrying these identification cards to access disaster-stricken areas and perform their duties.

Proper disaster response must include restoring essential services to affected residents as soon as possible. As counties, we are among the many local government entities that ensure the continuity and restoration of water service to our constituents, without which homes become uninhabitable and response services delayed and obstructed. This measure assists our water utility workers in carrying out their duties and restoring service as quickly as possible in emergency situations by making them easily identifiable to law enforcement. The recent Palisades and Eaton wildfires, only the latest in a series of catastrophic disaster events, have demonstrated the need to ensure that response efforts are as coordinated as possible. This bill would be a valuable step forward in those efforts.

For these reasons, we are pleased to support SB 1001. If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

CSAC Officers

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

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

April 17, 2026

The Honorable Henry Stern
Chair, Senate Committee on Emergency Management
1020 N Street, Suite 549
Sacramento, CA 95814

RE: SB 1270 (Richardson) Wildfire mitigation program: financial assistance to counties
As amended on April 16, 2026 – SUPPORT
To be heard in the Senate Committee on Emergency Management on April 21, 2026.

Dear Chair Stern,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we write in **support** of Senate Bill 1270 related to wildfire mitigation financial assistance.

Existing law established the California Wildfire Mitigation Program (CWMP) and the California Wildfire Mitigation Financial Assistance Program (CWMFAP) to support home hardening and defensible space in high-risk, socially vulnerable communities. Through a Hazard Mitigation Assistance (HMA) grant from the Federal Emergency Management Agency (FEMA), CWMP developed a statewide framework for community-level home hardening and launched pilot programs in San Diego, El Dorado, Tuolumne, Siskiyou, Lake, and Shasta Counties. These efforts are delivering practical and equitable solutions that enhance public safety, protect vulnerable communities, and reduce long-term disaster-related costs.

SB 1270 would extend financial assistance to counties ranked seventh through tenth in combined wildfire risk and social vulnerability. By building on the state's existing efforts and further targeting resources to the highest-risk communities, the bill advances cost-effective, data-driven investments in wildfire mitigation. For these reasons, we are pleased to **support** SB 1270. We also respectfully encourage expanding the program to include all 58 counties, with funding prioritized based on demonstrated levels of wildfire risk and need.

CSAC Officers

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

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

April 15, 2026

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

RE: **SB 1313 (McNerney) Public water systems: grants and loans: perfluoroalkyl and polyfluoroalkyl substances.**
Notice of SUPPORT *(As Amended on April 6, 2026)*

Dear Chair Blakespear,

On behalf of the undersigned organizations, we are pleased to **support SB 1313 (McNerney)**, which would clarify that projects addressing perfluoroalkyl and polyfluoroalkyl substances (PFAS) are eligible for funding under California's Drinking Water State Revolving Fund (SRF) program for the State Water Resources Control Board to provide funding to public water systems to address PFAS in drinking water. This clarification would help ensure that communities across the state can access critical financial assistance to address PFAS contamination and comply with federal drinking water standards.

California's State Revolving Fund programs are primarily supported through federal capitalization and state matching funds, and they operate by recycling repayments, primarily as loans, to finance new water infrastructure projects. These programs are essential tools for local agencies seeking to upgrade treatment facilities, replace aging infrastructure, and protect water quality and public health.

With the establishment of a federal drinking water standard for PFAS in 2024, public water systems of all sizes are now responsible for monitoring and treating these contaminants. However, PFAS treatment can require significant capital investment, particularly for small, rural, and economically disadvantaged areas with limited fiscal

capacity. SB 1313 would provide an important clarification that PFAS-related projects, are eligible under the Drinking Water State Revolving Fund program to offer assistance to public water systems. This bill would support continued access to funding, promote infrastructure sustainability, and reinforce the state's commitment to safe, clean, and affordable drinking water.

For these reasons, the undersigned organizations respectfully **support SB 1313 (McNerney)** and respectfully request your **"AYE"** vote when the bill is heard in committee.

If you have any questions, please contact the bill sponsor, the League of California Cities, by reaching out to Legislative Advocate Melissa Sparks-Kranz at msparkskranz@calcities.org or 916-658-8232.

Sincerely,

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities
(sponsor)

Charles Delgado
Legislative Advocate
California State
Association of Counties

Jennifer Capitolo
Executive Director
California Water Association

Paul DiMaggio
President, Board of
Directors
Central Basin Water
Association

Christina Hildebrand
President/Founder
A Voice for Choice Advocacy

Andrea Abergel
Director of Water
California Municipal
Utilities Association

Valerie Noble
President
California Health
Coalition Advocacy

James Lee
General Manager
Crescenta Valley
Water District

Carlos Quintero
General Manager
Sweetwater Authority

cc: The Honorable Jerry McNerney
Members, Senate Environmental Quality Committee
Taylor McKie, Consultant, Senate Environmental Quality Committee
Scott Seekatz, Policy Consultant, Senate Republican Caucus

California Coalition on Workers' Compensation
CCWC
CAJPA
California Association of Joint Powers Authorities
CALIFORNIA HOTEL & LODGING ASSOCIATION
CalChamber
PRISM
Public Risk Innovation, Solutions, and Management
CALIFORNIA J·P·I·A
Lien On Me, Inc.
NONPROFITS UNITED
CA-SIG
California Alliance of Self-Insured Groups, Inc.
A California Non-Profit Mutual Benefit Corporation
REED FAMILY COMPANIES
Calforests
California Forestry Association
CALIFORNIA FARM LABOR CONTRACTOR ASSN.
CFLCA
ALLIED MANAGED CARE INCORPORATED
SIG
Schools Insurance Group
CAL SMACNA
CALIFORNIA SELF-INSURERS' SECURITY FUND
CSIA
California Self-Insurers Association
AIMS
ACCLAMATION INSURANCE MANAGEMENT SERVICES
GREATER BAKERSFIELD CHAMBER
BUILDING Something Better
CALIFORNIA ATTRACTIONS AND PARKS ASSOCIATION
CAPA
PIPS
The Protected Insurance Program for Schools & Community Colleges Joint Powers Authority
RCRC
FLASHER BARRICADE ASSN.
CALIFORNIA ASSOCIATION of WINEGRAPE GROWERS
NAIOP
COMMERCIAL REAL ESTATE DEVELOPMENT ASSOCIATION
SoCAL CHAPTER
CALIFORNIA RESTAURANT ASSOCIATION
MURRIETA/WILDOMAR CHAMBER OF COMMERCE
cga
CSAC
Gateway Chambers Alliance
CBIA
CALIFORNIA BUILDING INDUSTRY ASSOCIATION
NETWORKS BY DESIGN
ABC California
danville area CHAMBER OF COMMERCE
BREA CHAMBER
CATALYST. CONVENER. CHAMPION.
NORWALK 100
1923 2023
CHAMBER OF COMMERCE
Oceanside CHAMBER of COMMERCE
ADVANCING OCEANSIDE
The Chamber
Long Beach Area Chamber of Commerce
CARLSBAD CHAMBER OF COMMERCE
CFCA
CALIFORNIA FUELS + CONVENIENCE ALLIANCE
CCBA
MISSION VIEJO
Making Business Happen
CHAMBER OF COMMERCE
CMTA
CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION
palm desert area chamber of commerce
CALIFORNIA RETAILERS ASSOCIATION
Consumers Economy Jobs
SANTA CLARITA VALLEY CHAMBER OF COMMERCE
ASSOCIATED GENERAL CONTRACTORS CALIFORNIA
THE ASSOCIATED GENERAL CONTRACTORS SAN DIEGO CHAPTER
NFIB
American Property Casualty Insurance Association
INSURING AMERICA
THE COUNTY OF FRESNO 1856
CALIFORNIA TRUCKING ASSOCIATION
We drive for a living. Safety is our priority.
California Hospital Association
VISTA Chamber of Commerce

April 14, 2026

The Honorable Liz Ortega
Chair, Assembly Labor and Employment Committee
1021 O Street, Suite 5120
Sacramento, CA 95814

RE: AB 1576 (Ortega) – Subsequent Injuries Benefit Trust Fund
OPPOSE

Dear Assemblymember Ortega,

The undersigned organizations respectfully **OPPOSE** your **AB 1576** because it does not adequately address the myriad problems with the Subsequent Injuries Benefit Trust Fund (SIBTF). SIBTF claims have skyrocketed in recent years, creating a fiscal crisis as recognized by two recent reports from the Legislative Analyst's Office and the Department of Industrial Relations (DIR) through RAND. While AB 1576 does include some desirable shifts in policy, it leaves the job unfinished much like AB 1329 (Ortega, 2025). Governor Newsom's veto stated that AB 1329 "does not contain the comprehensive reforms necessary to save SIBTF" and called on DIR to develop a comprehensive budget proposal. Governor Newsom's SIBTF reform proposal is being considered as a budget trailer bill, and we support that proposal.

California's SIBTF was established in 1945 with the purpose of encouraging employers to hire and retain workers that suffered from pre-existing disabilities. At the time, there was concern that employers would be reluctant to hire workers with disabilities for fear that the employer would be fully liable for the combined effects of an existing disability and a new workplace injury. SIBTF was established to protect the interests of veterans returning from World War II who were seeking to return to the workforce but presented a liability risk to employers.

While both state and federal law have evolved to protect workers from discrimination, SIBTF still serves an important function for injured workers who face the unfortunate results of combined industrial and non-industrial disabilities or impairments. A series of unfortunate court decisions combined with aggressive litigation tactics have caused the SIBTF to spin wildly out of control. The volume of applicants has nearly tripled over the past decade, causing assessments on employers to rise 800% between 2011 and 2024. Total annual payments from SIBTF have grown from $13.6 million in 2010 to $232 million in 2022. Total fund liabilities for resolved and pending cases between 2010 and 2022 are estimated at $7.9 billion (with some actuarial studies estimating the current cost closer to $28 billion), which is paid by direct assessments on both public and private employers. Unfortunately, AB 1576 does nothing to address the underlying court decisions and so will not impact the root causes for the increasing costs, which continue to spiral out of control: the DWC has projected that the SIBTF call volume will increase 25% in the next year.

The precipitous increase in the number of applications and payouts from the fund are the result of several factors, only some of which are addressed by the current contents of AB 1576. Our organizations believe that the legislature should address the easily identifiable problems with SIBTF in a comprehensive manner. The Department of Industrial Relations commissioned a study of the fund and its recent explosion in applicants and payments, and made several findings that could help the legislature identify reasonable and balanced policy solutions. The Legislative Analyst's

Office (LAO) also prepared a similar report that can help guide comprehensive reform that will stabilize the fund for those who need it. There is a clear path to controlling employer SIBTF costs:

- **Establish Stricter Eligibility Criteria**
  Administrative law decisions and outdated statutes have allowed aggressive attorneys to expand eligibility for SIBTF benefits beyond the original intent.

- **Require Previous Documentation of Pre-existing Conditions**
  Current law allows qualifying pre-existing conditions to be established without prior documentation by worker testimony alone, and this can be after the workplace injury occurs while trying to establish justification for SIBTF benefits. The legislature should follow the RAND and LAO recommendations and require prior documentation though medical records, workplace accommodations, or worker testimony prior to the workplace injury.

- **Restore Appropriate Method of Combining Multiple Disabilities**
  The 2020 decision in *Todd v. SIBTF* dramatically altered the method by which the prior disability and workplace disability are added together to determine SIBTF benefits. This decision changed longtime practices that considered the interaction between disabilities in multiple body parts and instead allows disabilities to be combined based on simple addition. Both RAND and the LAO have found that this decision made it far easier for applicants to justify the maximum SIBTF benefit. The legislature should overturn this court decision and return rationality to the method of combining multiple disabilities.

- **Applying Medical Legal Report Laws to SIBTF**
  Employer and labor representatives have collaborated twice in the last 20 years to negotiate mutually agreeable reforms to the workers' compensation system. In one of those reform negotiations, the state established new rules and processes for obtaining medical-legal reports that are necessary for deciding benefit levels. Unfortunately, those processes were not applied to the SIBTF claims because the rules for SIBTF claims are in a separate Labor Code section.

- **Reinvest in Claims Administration**
  SIBTF claims are administered by the Division of Workers' Compensation (DWC), which is facing significant backlogs that drive up administrative costs, delay benefits, and result in poor outcomes. The LAO report finds that SIBTF cases typically take five years to process despite the underlying workers' compensation case already being resolved, and a quarter of SIBTF claims take eight years to resolve. The state should invest in better claims handling practices and ensure that administrators are fully staffed.

While AB 1576 helps create stricter criteria for pre-existing conditions including proper documentation, it fails to make changes to the initial eligibility threshold for serious injuries, disability rating structure, stacking of disabilities, or prioritization of severe cases to address the significant case backlog.

For these reasons, our organizations respectfully oppose **AB 1576**. If you have any questions, please contact Jason Schmelzer at jason@syaslpartners.com.

Sincerely,

Jason Schmelzer
California Coalition on Workers' Compensation

ABC California
Acclamation Insurance Management Services (AIMS)
Allied Managed Care (AMC)
American Property Casualty Insurance Association (APCIA)
Associated General Contractors, California
Associated General Contractors – San Diego Chapter
Brea Chamber of Commerce
California Alliance of Self-Insured Groups, Inc.
California Association of Joint Powers Authorities
California Association of Sheet Metal and Air Conditioning Contractors National Association
California Association of Winegrape Growers
California Attractions and Parks Association (CAPA)
California Building Industry Association (CBIA)
California Chamber of Commerce
California Craft Brewers Association
California Farm Labor Contractor Association
California Forestry Association
California Fuels and Convenience Alliance (CFCA)
California Grocers Association
California Hospital Association
California Hotel + Lodging Association
California Joint Powers Insurance Authority
California Manufacturing and Technology Association
California Restaurant Association
California Retailers Association
California Self-Insurers Association
California Self-Insurers' Security Fund
California State Association of Counties
California Trucking Association
Carlsbad Chamber of Commerce
County of Fresno
Danville Area Chamber of Commerce
Flasher Barricade Association (FBA)
Gateway Chambers Alliance
Greater Bakersfield Chamber of Commerce
Lien On Me, Inc.
Long Beach Area Chamber of Commerce
Mission Viejo Chamber of Commerce
Murrieta/Wildomar Chamber of Commerce
NAIOP Commercial Real Estate Development Association SoCal Chapter
National Federation of Independent Business (NFIB)
Networks By Design

Nonprofits' United
Norwalk Chamber of Commerce
Oceanside Chamber of Commerce
Palm Desert Area Chamber of Commerce
Partners Personnel
Protected Insurance Program for Schools and Community Colleges JPA
Public Risk Innovation Solutions and Management (PRISM)
Reed Family Companies
Rural County Representatives of California
Santa Clarita Valley Chamber of Commerce
Schools Insurance Group
Southwest California Legislative Council
Vista Chamber of Commerce

CC: Members and Consultants, Assembly Insurance Committee
The Honorable Liz Ortega, California State Assembly

April 13, 2026

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

Re: **Assembly Bill 1961 (Ahrens). Civil actions: protective orders: workplace violence.**
As Amended March 27, 2026 – SUPPORT
To be heard in Assembly Committee on Judiciary on April 14, 2026

Dear Chair Kalra,

On behalf of the California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (Cal Cities), and California Association of Joint Powers Authorities (CAJPA), we write in support of Assembly Bill 1961 (Ahrens), related to workplace violence restraining orders. This measure seeks to provide employers with additional tools to address threats targeting employees through existing mechanisms and closes a gap in current law.

Under current law, employers may seek workplace violence restraining orders on behalf of employees who face harassment, unlawful violence, or credible threats of violence, so long as the threat is reasonably connected to the workplace. However, this requires the naming of a specific individual or individuals who have been threatened. This approach works effectively when the circumstances match the requirements set forth in filing process. However, public agencies are often subject to threats aimed at groups or a worksite location and not a named individual.

Public agencies have seen an unfortunate rise in hostility and threats form the public. In recent years, county registrars have faced bomb threat[1]and mailing of substances that are either harmful or designed to appear harmful[2]. These incidents have a real impact on employees' sense of safety and security even when an individual is not named.

AB 1961 addresses this problem by changing the definition of "employee" in the Civil Code of Procedure to encompass specific groups of workers based on their worksite locations. This change aims to reflect the real circumstances of the threats' intended audience or target.

We are committed to providing safe working conditions and secure worksites. AB 1961 furthers that commitment by providing an additional, meaningful mitigation step to stem future threats, escalation of threats, or even potential acts against employees. On behalf of the undersigned organizations, we respectfully request your AYE vote.

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

Faith Borges
Legislative Advocate
California Association of Joint Powers Authorities
fborges@publicpolicypartnership.com

[1] LA County election office receives latest in series of bomb threats (ABC News 7 | November 9, 2024)
[2] Presumptively Dangerous Substance Found in California County Elections Office (Secretary of State | January 17, 2024)

Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

CC: The Honorable Patrick Ahrens, Member, California State Assembly
Members and Consultants, Assembly Committee on Judiciary
Nicholas Liedtke, Chief Counsel, Assembly Committee Judiciary
Liz Enea, Policy Consultant, Assembly Republican Caucus

April 13, 2026

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

Re: **AB 2027 (Ward): Worker data: prohibitions: artificial intelligence.**
As amended April 9, 2026 – OPPOSE
To be heard in Assembly Committee on Privacy and Consumer Protection on April 16, 2026

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), Association of California Healthcare Districts (ACHD), Association of California School Administrators (ACSA), and League of California Cities (Cal Cities) we write in respectful opposition to AB 2027 (Ward), which sows uncertainty into how public agencies can use artificial intelligence (AI) tools and creates new restrictions for the use of third-party systems that includes a wide array of technology.

We understand the reasonable concerns about the rapid integration of new technologies into daily life. However, the scope of this bill is vast and would leave significant questions about whether agencies can use AI systems or how they could train them to perform their tasks.

Local agency employers are incorporating AI and automated decision system (ADS) technology to improve service delivery, address risks, and empower employees to focus on more meaningful work through streamlining some rote aspects of job duties. State law has protected the right of public employees to bargain, and most public employees have a property interest in their position that is protected by due

process[1]. Public agencies and their workforce have long bargained over the conditions of their workplace and, more frequently, we have seen MOUs include agreements on the use of AI or ADS.

Creates uncertainty for how AI systems can be trained

We appreciate the efforts of the author and sponsor to narrow the bill. However, the new provisions create uncertainty regarding what restrictions remain for public agencies and other employers using AI. AI systems rely on data inputs to train them to work effectively. It is hard to fathom how they could function effectively without the input of the public employees and officials with firsthand knowledge of and experience on how to deliver a service or manage risks.

While the April 9 amendments provide a narrower set of restrictions, it is not clear how the prohibition on the use of "personal information," could apply to tools already used by public agencies or that could be adopted in the near future. The amendments refer to the definition of "personal information," in Civil Code § 1798.140. That definition includes information that "…relates to…" or "…is reasonably capable of being associated with…" an individual. It is not clear where a boundary may exist for public agencies and their employees to train an AI system. Due to the bill's significant penalties, this could impose an unnecessary chilling effect on the adoption of new technologies.

Public agencies are not governed by the California Consumer Privacy Act (CCPA). This law would compel agencies to navigate a law designed for private sector activities. Public agencies are not a business and they serve the public, not consumers. Public agencies have, instead, been subject to many data privacy and confidentiality laws for decades. We believe it is more appropriate to rely on existing frameworks for data privacy and confidentiality to protect sensitive data for the public workforce.

Restrictions on replication or automation could limit tools that supplement the workforce

Collectively, the terms replication, automation, and replacement, coupled with the bill's defined terms, may extend this bill's application to vast swaths of AI technology uses, including for efficiency and safety, as well as innocuous uses and legacy automated technologies.

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

Public agencies are not interested in replacing the public workforce with machines. Public agencies do, however, believe in using new technology to better serve residents of California and improve conditions for the public workforce. Public agencies are already using these tools in ways that improve delivery of services, mitigate disaster risk, strengthen the social safety net, and empower the public workforce to grow, develop, and replace rote tasks with more meaningful work. These include use of AI systems to:

- Detect water contamination;
- Performing road maintenance triage, detection of road hazards, and identification of potholes;
- Detecting wildfires and earthquakes;
- Dam safety monitoring;
- Leak detection for water pipelines;
- Improve efficiency for public benefit enrollment and pupil attendance; and
- Accelerate permitting following disasters, including the Los Angeles wildfires.

Each of these tools are used not to replace public employees with machines, but to supplement their work. Each tool could meet the definition of *replicating* or *automating* a worker's job.

These new tools represent a new era of service delivery. As the public sector workforce adopts new technologies, we ask that legislation not hinder the use or potential use of innovations that are already proving to support critical public sector operations.

While we appreciate the intent to narrow the bill, we remain opposed due to unresolved questions about how the bill will work in practice. For public agencies, the costs are steep. The bill subjects public agencies to civil actions, opening them up to liability for punitive damages and attorney's fees. At a time when local agencies are facing mounting fiscal uncertainty due to legal liability, we have significant concerns for new courses action that can strain local agency budgets.

Finally, we believe the inclusion of independent contractors in the definition of "worker" blurs the roles of employer and workers, while increasing compliance complications as well as increasing litigation risk.

We recognize the concerns surrounding the adoption of new workplace technologies that have motivated this bill and other recent legislation. We are willing to continue engaging on legislation that addresses common goals. However,

any new policy must take into account the significant differences between public and private employers in existing state statute for represented labor, the purpose of local government agencies and that of private companies, and the where the funding will come from to accomplish the new requirements.

We are concerned AB 2027 could have vast unintended consequences that prohibit innovation and tools used to assist employees and ensure access to public benefits.

For these reasons, we must remain **opposed** to AB 2027 and urge your "NO" vote.

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
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Sarah Bridge
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Aaron Avery
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California Special Districts Association
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Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

Dorothy Johnson
Legislative Advocate
Association of California School
Administrators
djohnson@acsa.org

CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Assembly Committee on Privacy and Consumer Protection
Slater Sharp, Senior Consultant, Assembly Committee on Privacy and Consumer Protection
Liz Enea, Policy Consultant, Assembly Republican Caucus

DATE: April 15, 2026

TO: Members, Assembly Insurance Committee

SUBJECT: AB 2098 (KALRA) WORKERS' COMPENSATION: MEDICAL TREATMENT
OPPOSE UNLESS AMENDED – AS AMENDED MARCH 26, 2026

The undersigned organizations are respectfully **OPPOSED UNLESS AMENDED** to **AB 2098 (Kalra)**.

AB 2098 mirrors an attempted bill from 2024 (SB 1205 (Laird)) related to time off work for workers' compensation-related appointments. While we appreciate that some of the language we had proposed in SB 1205 remains, we do have two outstanding concerns:

1. **Undue hardship/business necessity: AB 2098** provides that all employers (regardless of size) must provide time off work for employees who are attending workers' compensation appointments. There is no time limit on the amount or frequency of leave. While there is an exception for a "business necessity," that exception is quite narrow.

   We believe the most comparable scenario to time off for medical appointments is reasonable accommodations under FEHA. There, because there is no set statutory time limitation on the amount of time off an employee may seek, FEHA provides employers with an ability to decline or modify a request where the time off would be an "undue hardship". A small employer, for example, would be able to make that showing more easily than a larger employer. Another example would be an employer in an industry like healthcare where emergencies or statutory staffing ratios may limit times during which an employee can be absent. We would prefer to see language more akin to the undue hardship standard for accommodation requests under FEHA.[1]

2. **Penalties**: An employer that discriminates or retaliates against an employee for filing a workers' compensation claim is subject to penalties under a Section 132a claim. **AB 2098** amends Section 132a directly to say that any employer who discharges, threatens to discharge, or discriminates against an employee for taking leave to attend a medical appointment under the newly created Labor Code section shall be guilty of a misdemeanor and shall owe damages. While we agree there needs to be enforcement of obligations related to time off for appointments, we read this language as stating that any failure to provide time off is discrimination and a violation of Section 132a, which we believe is inappropriate. There is similar language in the proposed Section 4600.03(c)(2).

   Any error by a small business, belief that the employer could legitimately claim a business necessity for denying a request, or effort to ask the employee to reschedule an appointment subjects the employer to a misdemeanor and damages. Last year we had proposed language stating that an *unreasonable* denial of time off *may* constitute a violation of 132a and we believe that is the appropriate direction.

[1] *See* Government Code Section 12926(u).

For these reasons, we must respectfully **OPPOSE UNLESS AMENDED AB 2098**.

Sincerely,

Ashley Hoffman
Vice President and Deputy Chief of Staff for Advocacy
California Chamber of Commerce

American Property Casualty Insurance Association (APCIA), Laura Curtis
California Association of Joint Powers Authorities, Faith Borges
California Chamber of Commerce, Ashley Hoffman
California Coalition on Workers' Compensation, Jason Schmelzer
California Hospital Association, Kalyn Dean
California State Association of Counties, Eric Lawyer
Rural County Representatives of California (RCRC), Sarah Dukett
Public Risk Innovations, Solutions, & Management (PRISM), Jen Jamelin

cc: Erika Ngo, Office of Assemblymember Ash Kalra
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of Governor Newsom
Consultant, Assembly Insurance Committee
Bill Lewis, Consultant, Assembly Republican Caucus

AH:kas

April 14, 2026

The Honorable Dr. Corey Jackson
Member, California State Assembly
1021 O Street, Room 6120
Sacramento, CA 95814

RE: Assembly Bill 2214 – OPPOSE
As Amended April 13, 2026

Dear Assemblymember Jackson:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), League of California Cities (Cal Cities), Urban Counties of California (UCC), and California Special Districts Association (CSDA) we must regretfully oppose your Assembly Bill 2214, which would authorize the use of local agency funds on deposit with the State Treasurer's Pooled Money Investment Account for purposes that are inconsistent with liquidity requirements of the local agencies investing in that fund.

The Local Agency Investment Fund (LAIF) is managed by the California State Treasurer's Office (STO) and invests in high-quality, low-risk securities (like U.S. Treasuries). It is part of the Treasurer's Pooled Money Investment Account (PMIA). Its purpose is to preserve capital, and the return on investment is a tertiary priority for local agencies that place deposits with LAIF. Due to the high-quality investments the STO uses for funds in PMIA, this is an ideal repository for public funds that must be protected and regularly called upon to meet near-term payments and meet near-term budgetary obligations of local agencies. Access to funds in the PMIA, including funds in LAIF, can be provided with speed—typically same day or next business day, depending on timing and size. Given the State's strict requirements on where local agencies can put public funds, LAIF is an attractive option for agencies looking to balance short, medium, and long-term investments that can also meet liquidity needs.

AB 2214 seeks to carve out $4 Billion in PMIA funds, transfer those dollars to a new fund**,** and dedicate those funds for lending activities that are not consistent with the fund's management and investors' needs. Although the measure no longer explicitly draws from LAIF, LAIF constitutes a significant portion of PMIA, and the proposal

therefore remains a source of serious concerns. The practical consequence of making changes to PMIA, as mandated in AB 2214, would be for local agencies to withdraw their funds from LAIF and find a similar option that meets their safety and liquidity requirements. This could reduce the cost efficiencies of pools as large as LAIF, thereby reducing the benefit to the taxpayer.

In addition, the PMIA Board regularly approves an agenda item to transfer tens of billions of dollars from the PMIA to the State General Fund on a short-term basis to ensure the State can meet its financial obligations, such as debt service, payroll, and payments to local governments. Legislation that would commit billions of dollars from PMIA into long-term investments, such as mortgages, should be carefully reviewed by the State Controller and the Department of Finance to ensure that adequate liquidity is maintained.

The nature of our opposition is not to a proposal that seeks to help small businesses and first-time homebuyers, but rather is to the funding mechanism, which would take local taxpayer funds for long-term lending activities when those funds are supposed to be secure and highly liquid in order for public agencies to meet debt service obligations, payroll, or other near-term financial obligations.

For these reasons, RCRC, CSAC, CalCities, UCC, and CSDA must oppose AB 2214 as currently drafted. If you should have any questions, please do not hesitate to contact us.

Sincerely,

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cc: The Honorable Avelino Valencia, Chair, Assembly Banking & Finance Committee
The Honorable Juan Carrillo, Chair, Assembly Local Government Committee
Members, Assembly Banking & Finance Committee
Members, Assembly Local Government Committee
Desiree Nguyen Orth, Chief Consultant, Assembly Banking & Finance Committee
Jimmy MacDonald, Principal Consultant, Assembly Local Government Committee
Bill Lewis, Consultant, Assembly Republican Caucus
Tobias Wolken, Consultant, Assembly Republican Caucus

April 14, 2026

The Honorable Jessica Caloza
California State Assembly
1021 O Street, Suite 5620
Sacramento, CA 95814

Re: **AB 2530 (Caloza): Employment: Cal/WARN Act: plant closings and mass layoffs**
As amended 4/13/26 – OPPOSE
Awaiting hearing – Assembly Judiciary Committee

Dear Assembly Member Caloza:

On behalf of the Urban Counties of California, the Rural County Representatives of California, the California State Association of Counties, and the California Special Districts Association, we write to share our opposition to your Assembly Bill 2530, a measure that seeks to make public agencies subject to the Cal/WARN Act. Given the considerable existing obligations required of public agencies by law for implementing layoffs, we disagree that the inclusion of public agencies in the Cal/WARN Act is warranted.

The California Worker Adjustment and Retraining Notification (WARN) Act requires employers with 75 or more employees to provide 60 days' advance notice of mass layoffs, relocations, or plant closures. These notification requirements are intended to protect employees from an abrupt loss of employment or obligation to relocate. However, local agencies are already subject to the statutory provisions of the Meyers-Milias-Brown Act (MMBA), which require local agencies to meet and confer with recognized employee organizations regarding changes to employees' wages, hours, or terms and conditions of employment, including layoffs.

Specifically, the MMBA, as well as subsequent case law and decisions by the Public Employment Relations Board (PERB), ***requires*** that employers bargain over the effects of layoffs, which includes: the number of employees affected, the selection criteria that identifies affected employees, the timing of the layoffs, severance pay and benefits, re-employment rights, and impacts on the workload and safety of remaining employees. While layoffs may be a necessary tool in a challenging fiscal climate, they cannot be implemented for unlawful reasons and the mandatory "effects" bargaining must occur ***before*** the layoffs are implemented. Simply put, layoffs ***may not happen*** without a "meet and confer" between management and labor.

In addition, there are provisions of the bill that do not make sense for public employers, such as notification requirements for when the "establishment" is sold or relocated, which simply don't apply in a public agency context.

AB 2530 obligates public agencies to a duplicative process better suited to the private sector; it would mandate costly administrative procedures for implementation and provide no additional benefit to employees. As a result, we are opposed to AB 2530. Please reach out if you have any questions about our position.

Sincerely,

Jean Kinney Hurst
Legislative Representative
Urban Counties of California

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Sarah Dukett
Policy Advocate
Rural County Representatives of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

cc: The Honorable Ash Kalra, Chair, Assembly Judiciary Committee
Members and Consultants, Assembly Judiciary Committee

April 13, 2026

The Honorable Darshana Patel
Chair, Assembly Education Committee
1020 N Street, Room 159
Sacramento, CA 95814

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As amended April 9, 2026 – SUPPORT
To be heard in Assembly Education on April 22, 2026

Dear Chair Patel:

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), League of California Cities (Cal Cities), and California Special Districts Association (CSDA), we are pleased to support Assembly Bill 2640 (Hadwick), which we believe provides sensible fiscal relief and the fiscal flexibility necessary for efficient, modern governance by local agencies. The state mandate reimbursement process, and administrative issues therein generally, have long burdened local governments and our organizations continue to support efforts to reform the current process.

Reimbursable State Mandate Process: Long and Uncertain
Every year, the Governor signs, on average, more than 1,000 bills and enacts new laws in the interest of governing California. Many new laws require local governments to implement new programs or provide new services. Laws that require local government entities to implement new programs or provide higher levels of service to the public are often referred to as "reimbursable state mandates," a term of art particular to California.

Local governments are required to comply with all laws that create new state-mandated programs and services. When those new initiatives do not come with an appropriation of funds to carry them out, local governments only receive funding to carry out many state-mandated programs through reimbursement payments from the state long after the fact, and only when a state body has adjudicated the matter through a convoluted claims process.

Reimbursement for local governments to comply with new state-mandated programs is not automatic. Local governments initiate the process to receive reimbursement approval via the Commission on State Mandates, which may take a year or more to determine whether the new law meets the constitutional criteria for reimbursement—and even longer to establish a process and rate for reimbursement. Therefore, local governments comply with new costly laws pending reimbursement status, often funding these programs alone for years, facing the uncertainty of reimbursement. Local governments comply with all other state mandates using local revenues.

Backlog of Unreimbursed State-Mandated Costs Owed to Local Governments

Over the years, the state has accrued a significant backlog of funds owed to local governments for work performed to carry out state-mandated projects. According to the State Controller's Office[1], as of October 2025 the state owes local governments collectively $910.9 million, including estimated accrued interest. This nearly $1 billion figure includes funds owed for claims for active state-mandated programs, unpaid claims from prior fiscal years, and outstanding "incorrect reduction" claims filed with the Commission on State Mandates.

How This Measure Helps

Even after a reimbursement is issued, an audit or review by the State Controller's Office may reduce the reimbursement amount paid by disallowing previously approved payments years after the fact. When the State Controller's Office disallows costs previously claimed by counties, the affected county may choose to either remit the disallowed amount to the state, or the State Controller's Office offsets (withholds) commensurate amounts from state-mandated costs reimbursements filed by that county in subsequent fiscal years. Either way, the local government then must pay that disallowed amount back to the state. These repayments must occur even if the state has other outstanding debts owed to that local government. For some local governments, especially communities with constrained budgets, repaying even a portion of their reimbursement claims causes fiscal strain.

This measure will authorize the Controller to allow a local government to offset any reduced reimbursement from other unpaid reimbursement claims occurring on or after January 1, 2027, or request an adjustment to the payment of claims for underpayments or overpayments that occurred in previous years. This change would provide local governments with financial relief instead of allowing the state to claw back funds while still owing debts to that same local government. This mechanism supports cash-strapped local governments and retains critical funding for under-resourced communities.

Local governments continue to support efforts to modernize the state mandate claiming and reimbursement process. AB 2640 represents a modest, but important, step towards these

[1] State Controller's Office AB 3000 State-Mandated Program Cost Report of Payments and Appropriations (October 31, 2025)

reform efforts and provides needed fiscal flexibility for local agencies. For these reasons, we are pleased to support AB 2640. Should you have any questions regarding our position, please do not hesitate to contact us.

Sincerely,

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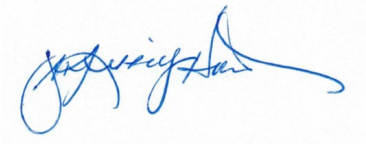

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CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Assembly Education Committee
Tanya Lieberman, Chief Consultant, Assembly Education Committee
Bob Becker, Consultant, Assembly Republican Caucus

April 13, 2026

The Honorable Rebecca Bauer-Kahan, Chair
Assembly Privacy and Consumer Protection Committee
1021 O Street, Suite 5210
Sacramento, CA 95814

Re: AB 2656 (Petrie-Norris): Public Employees: notice: artificial intelligence performing service within the scope of work
As amended 3/19/26 – OPPOSE
Set for hearing 4/16/26 – Assembly Privacy and Consumer Protection Committee

Dear Assembly Member Bauer-Kahan:

On behalf of the Urban Counties of California (UCC), the California Special Districts Association, the Rural County Representatives of California, and the California State Association of Counties, we write in respectful opposition to Assembly Bill 2656, Assembly Member Cottie Petrie-Norris' measure that will require local agencies to provide a recognized employee organization no less than 45 days' written notice before taking an action to develop, purchase, implement, or utilize any generative artificial intelligence to perform a service that is within the scope of work of the job classification represented by the recognized employee organization. While this brief measure appears simple on its face, these notification requirements will burden local agency employers, preclude efficiencies, impact service delivery, and undermine productive labor relations with little benefit.

Like much of the public sector, local agencies are cautiously testing the use of artificial intelligence tools in day-to-day operations. Tools that promise to streamline routine activities (like the note-taking tools included in virtual meeting software such as Zoom and Teams) allow our employees to focus their time and attention on the most important components of serving the public. Often, these tools are routine elements of daily office life, like ChatGPT and Microsoft Copilot, and such tools are frequently included in off-the-shelf software ubiquitous in the modern office environment. When tools become available that assist with specific aspects of public service (like charting in a health clinic or monitoring drinking water safety), they are often vetted in partnership with employees with the mutual goals of ensuring staff is empowered to focus on certain aspects of their work and providing more efficient and effective outcomes that benefit the public.

Importantly, local agencies remain subject to the statutory provisions Meyers-Milias-Brown Act (MMBA), which require local agencies to meet and confer with recognized employee organizations regarding changes to employees' wages, hours, or terms and conditions of employment. Existing law provides a robust framework for determining when particular uses of generative artificial intelligence may actually have a significant and adverse effect on the employment relationship, in

which case notification (and more) is already required. This bill is therefore both overbroad and unnecessary.

Finally, local agencies are subject to last year's AB 339 (Chapter 687, Statutes of 2025), which requires additional notice to recognized employee organizations regarding a range of local agency contracting activities, even when those activities do not rise to the level of triggering meet-and-confer obligations under the MMBA's usual standards. This additional notification requirement has been incredibly burdensome for local agencies and has required a significant amount of time, legal resources, and training to implement. The further unworkable notification provisions in this bill would exacerbate these concerns and represent another state mandate for which the state may be obligated to provide reimbursement under Article XIII B of the California Constitution.

It is also important to note the myriad other legislative measures that seek to limit the use of artificial intelligence in the public sector in multiple forms. Regardless of the benefit of any new technologies and regardless of any obligation to take such action in a public meeting, local agencies would be seriously hindered in adopting such tools under these proposals. To be sure, if some of those measures are approved by the Legislature, there will be no notification necessary as many of them would effectively impose bans on the use of most AI tools.

AB 2656 appears to be a solution without a clearly identified problem. As a result, we must oppose the bill. Should you have any questions about our position, please reach out to us directly.

Sincerely,

Jean Kinney Hurst
Legislative Representative
Urban Counties of California

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Sarah Dukett
Policy Advocate
Rural County Representatives of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

cc: The Honorable Cottie Petrie-Norris, California State Assembly
Members and Consultants, Assembly Privacy and Consumer Protection Committee

April 10, 2026

The Honorable Christopher Cabaldon
Chair, Senate Privacy, Digital Technologies, and
Consumer Protection Committee
California State Senate
1020 N Street, Room 568
Sacramento, CA 95814

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended March 26, 2026)*

Dear Chair Cabaldon:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, Association of California Healthcare Districts, League of California Cities, Association of California School Administrators, California Association of School Business Officials, and Public Risk Innovation, Solutions, and Management, write in respectful opposition to Senate Bill (SB) 947, which would complicate the routine work of local governments and educational agencies, while increasing expenses, without a clear need.

Prior Legislation and Prior Veto
SB 947 is a successor to last year's SB 7 (McNerney), which was vetoed by Governor Newsom. In the Governor's Veto Message, he stated:

> *However, rather than address specific way employers misuse this technology, the bill imposes unfocused notification requirements on any business using even the most innocuous tools. The proposed solution fails to directly address incidents of misuse.*

Indeed, local governments have not been provided with specific examples of their misuse of these technologies.

We acknowledge that SB 947 does not contain pre-use notification requirements as SB 7 did. However, SB 947 takes important and costly steps backwards from the enrolled version of SB 7, directly implicating the concerns raised by the Governor. Specifically, SB 7's human review and post-use notification requirements applied when an employer **"primarily relied"** on the ADS to **"make"** a discipline,

termination, or deactivation decision. SB 947 expands these requirements to when an employer merely **"uses"** an ADS to **"assist"** in making such decisions, thus significantly increasing the scope and scale of covered employer actions. Further, SB 7 required a human reviewer to review the ADS output, and compile and review other information that is relevant to the decision, if any. In contrast, SB 947 requires the employer to direct a human reviewer to conduct an **"independent investigation"** and compile corroborating and supporting information. Corroboration is now required for any use of an ADS output to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. The combination of increasing the scope of the bill, and increasing the burdens of compliance, will deter local governments from using these important emerging technologies and increase their litigation risk.

SB 947 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 are significant.

SB 947 is an Unfunded Mandate on State and Local Budgets
The initial and ongoing obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. Some small agencies and departments may struggle to comply with the bill's requirements. The bill requires the employer to provide, on request, a copy of the most recent 12 months of the worker's own data primarily used by an ADS to make a discipline, termination, or deactivation decision, once per year, together with detailed information and requirements to protect third parties. Complying with, and potentially analyzing, these voluminous data requests will divert public resources from core responsibilities.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For public employers with represented workforces, collective bargaining agreements already provide mechanisms for appealing personnel decisions. This bill's enforcement provisions overlay appeal rights for public employees that could create confusion, workload redundancy, and legal uncertainty. The bill also defines an "employer" subject to its provisions to also include all branches of state government (see Proposed Labor Code Section 1520(d)(1)). With the state and local agencies grappling with a substantial and growing decline in support from the federal government for a variety of programs and services, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Applying SB 947 to Public Employers May Lead to Unintended Consequences
Local governments and educational agencies are responsible for essential services including operating and securing critical infrastructure, jails, hospitals, police and fire departments, and of course public education. They may use an ADS to support and enhance these functions but SB 947 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, could trigger the bill's significant requirements if the ADS output is used to make a discipline, termination, or deactivation decision – a line which may not always be clear, but which is critical due to resulting notification and human review requirements. 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 requirements, 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.

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.

Collective Bargaining Agreement Exception Does Not Resolve Our Concerns
Rather than resolving concerns, the bill's Collective Bargaining Agreement (CBA) exemption creates new problems by requiring that agreements waive the provisions of the bill and provide 'protections from algorithmic management' to qualify. As an example, in health care settings, this could be misinterpreted to place essential systems and tools—needed for core operations—into collective bargaining negotiations, potentially making their use incompatible with their intended purpose and undermining public health care delivery. Further, either complying with the statutory requirements of this bill, or agreeing to a CBA that addresses the same issue in this bill, would effectively narrow or remove the issue from bargaining.

Put simply, for public employers, the burdens potentially imposed by this bill far exceed the benefits and purported need.

For these reasons, our organizations must respectfully oppose SB 947. Please feel free to contact us at any time with questions or to further discuss our position.

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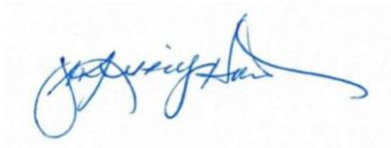

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Michael Pott
Chief Operating Officer
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CC:

The Honorable Jerry McNerney
Honorable Members, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Scott Seekatz, Policy Consultant, Senate Republican Caucus

April 13, 2026

The Honorable Christopher Cabaldon
Chair, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
1020 N Street, Room 568
Sacramento, CA 95814

RE: Senate Bill 951 (Reyes) – OPPOSE UNLESS AMENDED
As Amended April 9, 2026

Dear Senator Cabaldon:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), California Special Districts Association (CSDA), Urban Counties of California (UCC), the League of California Cities (Cal Cities) and Association of California Healthcare Districts (ACHD) we must regretfully oppose Senate Bill 951 (Reyes) unless amended, regarding workforce displacement or termination due to the adoption of certain technologies, unless amended to exempt local government employers.

SB 951 would establish California Worker Technological Displacement Act, and require employers to provide at least a 90-day advanced written notice before any reduction in hours or termination caused in whole or substantial part by the use of artificial intelligence (AI) or other automated technology (undefined). For employers of 100 or more, it establishes return rights for terminated employees and prohibition of termination during the 90-day notice period. Compliance failure causes an employer to be liable for back pay and any medical expenses incurred by the worker that would have been covered by an employer-sponsored health plan. The bill would also subject public agencies to a $500 fine for each day of a violation and allows any interested or uninterested party to file a report of compliance failure with the Labor Commissioner. It should be noted that independent contractors are included in the definition of “worker” so under SB 951, cities,

counties, and special districts would have to provide employees of a private company backpay and other benefits if proper notice is not given.

Importantly, local agencies remain subject to the statutory provisions of the Meyers-Milias-Brown Act (MMBA), which require local agencies to meet and confer with recognized employee organizations regarding changes to employees' wages, hours, or terms and conditions of employment. In those cases, existing law provides a robust framework for determining when particular uses of generative artificial intelligence may actually have a significant and adverse effect on the employment relationship, in which case notification (and more) is already required.

In addition, for public employers with represented workforces, including cities, counties, and special districts, the 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 to deter or discourage union membership. Specifically, Government Code Section 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 Section 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.

Finally, the requirement that certain employers (including many public entities) must provide displaced workers "the right of first bid on other positions with the employer" will immediately conflict with the provisions of negotiated memorandums of understanding (and merit-based civil service systems), which prescribe in detail the process for filling vacant positions. These provisions, including seniority consideration, bumping rights, and examination requirements, have been carefully developed by employers and employee organizations through collective bargaining, which would be undermined by SB 951. For federal grant-in-aid positions, new laws that conflict with merit-based civil service may jeopardize federal funding for social services.

In short, SB 951 creates processes that are likely better suited for private labor practices and does not fit local government employers. This bill would, mandate costly administrative procedures for implementation, and creates liability exposure for complaints brought by any member of the public for possible violations.

For these reasons, RCRC, CSAC, CSDA, ACHD, Cal Cities, and UCC must oppose SB 951 unless amended as described above. If you should have any questions, please do not hesitate to contact us.

Sincerely,

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Legislative Affairs, Lobbyist
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cc: The Honorable Eloise Gomez Reyes, Member of the California State Assembly
Members, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Christian Kurpiewski, Chief Consultant, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Morgan Branch, Policy Consultant, Senate Republican Caucus

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

April 15, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: SB 970 (Cervantes) Military or overseas voters.
As Introduced February 3, 2026 - SUPPORT
To be heard in the Senate Appropriations Committee on April 20, 2026

Dear Chair Cervantes,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we are proud to support Senate Bill 970. This measure would require the Secretary of State to develop regulations to facilitate the secure electronic return of ballots from military and overseas voters.

Counties support efficient and accessible voting for all. Election policies should aim to further our government's democratic republican nature by allowing and encouraging voting by a broad range of citizens, so that the government's decisions express the will of the people as fully as possible.

On July 23, 2025, the Secretary of State issued CCROV #25057, announcing that effective August 1, 2025, the Federal Voting Assistance Program discontinued its Department of Defense Fax Service. This service previously allowed military and overseas voters without access to a fax machine to return election materials, including voted ballots and completed Federal Postcard Applications, by fax to their county elections officials. As a result of this change, many military and overseas voters can no longer return ballots by fax and must now rely exclusively on overseas mail service, which can be lengthy and unreliable.

SB 970 would improve ballot return options for military and overseas voters by requiring the Secretary of State to promulgate regulations that facilitate the secure electronic return of ballots. California is currently one of only a few states that does not allow military and overseas voters to return a ballot electronically, other than by fax. This bill would modernize

CSAC Officers

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Colusa County

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Graham Knaus

California's approach to military and overseas voting by improving the reliability and timeliness of ballot return for these voters.

For these reasons, we are pleased to support SB 970. If you have any questions about our position, please do not hesitate to reach out to me at ejungwirth@counties.org.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

CC: The Honorable Sabrina Cervantes, Member, California State Senate
Members and Consultants, Senate Appropriations
Liah Burnley, Principal Consultant, Senate Appropriations
Robert Ingenito, Consultant, Senate Appropriations
Kirk Feely, Fiscal Director, Senate Republican Caucus

April 16, 2026

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

RE: SB 1319 (Durazo) California Public Records Act: public investment funds.
As Amended April 15, 2026
To be heard in the Senate Committee on Labor, Public Employment and Retirement April 22, 2026

Dear Chair Smallwood-Cuevas,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC) must respectfully oppose Senate Bill 1319 (Durazo) because it could substantially limit investment options for CalPERS, CalSTRS, and county retirement systems and ultimately raise annual contributions costs for both employers, including special districts and counties, and their employees.

SB 1319 would amend existing law to require pension systems to disclose information about private equity investments, including portfolio positions of their investments and the name(s), amount of commitments, and cash contributions made by all investors in a general partnership. The bill would also require pension systems to disclose the value of assets and the basis for continued operation of investments that remain active beyond the originally stated term.

While we believe in strong standards for public pension system transparency, we are concerned this change will put California pension systems at a competitive disadvantage compared to other institutional investors.

As of the end of the 2024-25 fiscal year, public pension systems in California managed well over $1 trillion in total assets. These funds are needed to pay retirement benefits to California's public employees: teachers, principals, firefighters, law enforcement, sanitation workers, and front-line service providers upholding the social safety net, to name just a few examples of our public workforce. While public employees and employers both contribute significantly to these pension assets, the majority of a pension fund's assets are made through investment returns.

Private equity has often been among the top performing asset classes for California's pension funds and has outperformed public equity investments. In recent years, California's pension funds have begun to outperform their peers, with CalPERS earning the highest three-year time-weighted return among peers and CalSTRS earning the sixth highest1.

By compelling pension systems to publish portfolio positions, SB 1319 could constrain opportunities for California pension fund investments in the most coveted general partnerships. This could have direct impacts on public agencies and the public workforce. Lost, or reduced, investment returns increase pension system costs. Those costs must be paid through higher contribution rates: directly impacting public agency budgets and the paychecks of public employees. We also have serious concerns regarding possible legal actions that could be taken by limited partners in these investments, as the bill could subject them to new disclosure rules well after the formation of legal agreements made among investors.

California's public workforce deserves the retirement benefits they have been promised. Bills that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers.

Sincerely,

[1] The CalPERS Private Equity Turnaround (January 2026)

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties
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Jean Hurst
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CC: The Honorable Maria Elena Durazo
Members, Senate Committee on Labor, Public Employment and Retirement
Glenn Miles, Principal Consultant, Senate Committee on Labor, Public Employment and Retirement
Jesse Herzer, Policy Consultant, Senate Republican Caucus

April 16, 2026

The Honorable Maria Elena Durazo
California State Senate
1021 O Street, Suite 7530
Sacramento, CA 95814

RE: SB 1319 (Durazo) California Public Records Act: public investment funds.
As Amended April 15, 2026

Dear Senator Durazo,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC) must respectfully oppose your Senate Bill 1319 because it could substantially limit investment options for CalPERS, CalSTRS, and county retirement systems and ultimately raise annual contributions costs for both employers, including special districts and counties, and their employees.

SB 1319 would amend existing law to require pension systems to disclose information about private equity investments, including portfolio positions of their investments and the name(s), amount of commitments, and cash contributions made by all investors in a general partnership. The bill would also require pension systems to disclose the value of assets and the basis for continued operation of investments that remain active beyond the originally stated term.

While we believe in strong standards for public pension system transparency, we are concerned this change will put California pension systems at a competitive disadvantage compared to other institutional investors.

As of the end of the 2024-25 fiscal year, public pension systems in California managed well over $1 trillion in total assets. These funds are needed to pay retirement benefits to California's public employees: teachers, principals, firefighters, law enforcement, sanitation

workers, and front-line service providers upholding the social safety net, to name just a few examples of our public workforce. While public employees and employers both contribute significantly to these pension assets, the majority of a pension fund's assets are made through investment returns.

Private equity has often been among the top performing asset classes for California's pension funds and has outperformed public equity investments. In recent years, California's pension funds have begun to outperform their peers, with CalPERS earning the highest three-year time-weighted return among peers and CalSTRS earning the sixth highest[1].

By compelling pension systems to publish portfolio positions, SB 1319 could constrain opportunities for California pension fund investments in the most coveted general partnerships. This could have direct impacts on public agencies and the public workforce. Lost, or reduced, investment returns increase pension system costs. Those costs must be paid through higher contribution rates: directly impacting public agency budgets and the paychecks of public employees. We also have serious concerns regarding possible legal actions that could be taken by limited partners in these investments, as the bill could subject them to new disclosure rules well after the formation of legal agreements made among investors.

California's public workforce deserves the retirement benefits they have been promised. Bills that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers.

Sincerely,

Eric Lawyer
Senior Legislative Advocate
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elawyer@counties.org

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

[1] The CalPERS Private Equity Turnaround (January 2026)

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

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

April 14, 2026

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

RE: AB 1602 (B. Rubio) Foster youth: disaster aid assistance.
As Introduced January 16, 2026 – SUPPORT
Set for hearing in Assembly Appropriations Committee on April 15, 2026

Dear Assemblymember Wicks:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Assembly Bill 1602 by Assembly Member Blanca Rubio. This measure would establish a 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 1602 will help stabilize children and 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 1602 authorizes county child welfare departments, county probation departments, and tribes 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 1602. Should you have any questions regarding our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org. Thank you for your consideration.

CSAC Officers

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Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

Sincerely,

Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Blanca Rubio, Member, California State Assembly
Honorable Members and Consultants, Assembly Appropriations Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

April 15, 2026

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

RE: Senate Bill 1016 (Blakespear) – Community Assistance, Recovery and Empowerment Act (CARE) Court – OPPOSE

Dear Chair Umberg,

On behalf of the County Behavioral Health Directors Association (CBHDA), the California State Association of Counties (CSAC), the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), **we write to share our opposition to Senate Bill 1016 (Blakespear), as amended on March 26, 2026.**

Background on WIC 5200

Welfare and Institution Code Section 5200 allows any individual to allege that another individual is a danger to themselves or others or gravely disabled as a result of their mental health condition, and to request a court-ordered county mental health evaluation of that person under the Lanterman-Petris-Short (LPS) Act. This has existed in California law since the inception of the LPS Act in 1967.

Proponents of the bill have argued that this bill is needed to compel counties to use this section, as counties rarely use this authority.

This authority has historically not been used because ***counties have more efficient and effective ways to evaluate an individual who is a danger to themselves or others or potentially gravely disabled.*** Namely, counties have stood up a statewide network of 24/7 community-based mobile crisis teams to help immediately respond and deescalate behavioral health crisis and connect individuals to services. Where an individual is considered a danger to themselves or others or gravely disabled, counties typically rely on LPS WIC Section 5150 to immediately detain and evaluate individuals who are at risk. In either scenario, if a person is found to meet the criteria for an LPS Conservatorship, a county is able to immediately assess and connect individuals to the public guardian for investigation, without having to go through a lengthy court process.

Concerns with SB 1016

- **Exclusion of CARE Act diagnoses:** This bill would update the law related to these unique petitions for evaluation by first, excluding individuals who have the diagnoses covered under CARE Act from eligibility for a petition under WIC 5200. While this change appears to be intended to encourage more CARE Act petitions, it may have the unintended consequence of arbitrarily restricting the public's options under WIC 5200 today, and again result in further unnecessary delays as interested parties may need to wait for the CARE petition process to play out.
- **Introduces an involuntary detention into the CARE Act process, thereby changing the voluntary nature of the CARE Act.** This bill expands authority of the court to involuntarily detain an individual subject to a petition under the CARE Act to an involuntary detention for the purposes of conducting an evaluation to determine whether there is probable cause that the individual is a danger to themselves, others, or gravely disabled. Because this assessment is not necessary to qualify an individual for CARE, it is concerning that the court could extend these orders to CARE Act respondents, and it would fundamentally alter the voluntary nature of CARE.
- **Creates a pathway for CARE Act petitioners to be granted a court-ordered involuntary evaluation based on their belief that the individual may be too impaired to be willing or able to participate in the CARE process, if the petition was dismissed by the court.** Counties are concerned with the lack of due process for the respondent, as well as the lack of clinical judgement necessary to trigger this involuntary detention for the purpose of an evaluation. This ability is extended to the perception on the part of the petitioner who lacks sufficient evidence under existing CARE Act statutes that the respondent may be at risk of becoming a danger to themselves or others or gravely disabled. Taken together, these changes would open the ability for petitioners to request involuntary detention and evaluations for individuals for whom there is no imminent or proven risk to themselves or others, thereby undermining the legislative intent of the LPS Act.

In summary, Californians may request an evaluation under WIC Section 5200 today, however, it adds an additional, unnecessary step to connect those most at risk with the array of services available to them through CARE, LPS, and community-based mobile crisis services. By tying together the involuntary, court-ordered evaluation process to CARE, the result of this bill will be to compel the very same involuntary detention options available to counties under WIC Section 5150 today as a consequence for individuals who, for myriad reasons, may be unwilling to participate voluntarily in the CARE process. In addition, because WIC Section 5200 is open to petitions from any person, this bill would significantly expand the number of individuals for whom counties would need to pursue involuntary evaluations, without the evidence that such a detention is warranted upfront.

For these reasons above, **we are opposed to SB 1016 and respectfully request your "No" vote.** For questions, please feel free to contact our respective organizations below.

Sincerely,

Amer W. Rashid
Director of Legislative Affairs
CBHDA
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Brendan McCarthy
Senior Legislative Advocate
CSAC
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Kelly Brooks-Lindsey
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Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org

CC: Honorable Senator Catherine Blakespear
Honorable Members of the Senate Judiciary Committee
Allison Whitt Meredith, Counsel, Senate Judiciary Committee
Stephanie Welch, Deputy Secretary, Health and Human Services Agency

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

April 16, 2026

The Honorable Matt Haney
Chair, Assembly Committee on Housing and Community Development
1020 N St. Room 156
Sacramento, CA 95814

RE: AB 2320 (Ta) Multifamily Housing Program: Homekey: adaptive reuse.
As introduced February 19, 2026
To be heard on April 22, 2026.

Dear Assemblymember Haney,

On behalf of the California State Association of Counties (CSAC), we respectfully write in support of AB 2320, which provides critical clarifications and flexibility within the Homekey+ program to better facilitate the development of permanent supportive housing.

Local governments strongly support the goals of Homekey+ and Proposition 1 to expand housing for individuals experiencing homelessness, including those with behavioral health needs. However, as currently structured, Homekey+ timelines do not adequately reflect the realities of project delivery, particularly for adaptive reuse developments. These projects frequently involve substantial demolition, structural reconfiguration, and major electrical and mechanical upgrades, making them far more comparable to new construction than traditional rehabilitation.

Under existing program guidelines, adaptive reuse projects are subject to compressed timelines that have proven infeasible in practice. As a result, otherwise viable projects have been unable to move forward, contributing to the program being undersubscribed despite significant available funding.

AB 2320 addresses this issue by aligning adaptive reuse timelines with those applicable to new construction, extending the allowable completion period to better match industry standards and real-world conditions. This targeted change will reduce barriers to participation, increase the number of eligible projects, and help ensure that Homekey+ funds are deployed efficiently to produce much-needed housing.

CSAC Officers

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Jeff Griffiths
Inyo County

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Graham Knaus

Our members have directly experienced these constraints. For example, jurisdictions working to advance adaptive reuse projects have identified feasible sites that could not proceed due to current timelines, despite significant local investment in project planning and partnership development. AB 2320 would provide the flexibility necessary to bring these types of projects forward.

By improving clarity and aligning program requirements with construction realities, AB 2320 strengthens an already successful program and supports the state's broader efforts to address homelessness through the expansion of permanent supportive housing.

For these reasons, CSAC is proud to support AB 2320 and we urge an 'aye' vote on this bill.

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties

CC: The Honorable Tri Ta, Member, California State Assembly
Members and consultants, Assembly Committee on Housing and Community Development

April 10, 2026

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

RE: Assembly Bill 2605 (Arambula) – OPPOSE UNLESS AMENDED
As Amended April 8, 2026

Dear Assemblymember Carrillo:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Urban Counties of California (UCC), we must regretfully oppose Assembly Bill 2605 (Arambula) unless amended to include a full and ongoing state appropriation to support its implementation. This bill would create new reporting requirements for counties in relation to public defense services.

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. 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 one of only four states that do not provide full or partial funding to counties for the delivery of this constitutionally mandated service. Counties, particularly small and rural counties, simply cannot absorb additional ongoing state-mandated costs without state funding.

AB 2605 would impose new reporting requirements on counties regarding the type of public defense system utilized, detailed information on case assignments, budgeting and expenditures, employment data, and case management data, creating additional administrative burdens without providing the necessary resources to support compliance. While data is critical in evaluating the efficacy of any program or system, these new requirements would divert limited local resources away from essential county services, including the provision of constitutionally mandated legal representation.

Local government budgets are increasingly constrained by a combination of effectively static or decreasing local revenues and ever-rising local costs and unfunded state mandates. Most notably, counties are also facing a looming fiscal crisis associated

with the implementation of H.R. 1, which is expected to increase demands on county safety net programs and indigent health services in the tune of up to $9.5 billion annually for counties alone. H.R. 1 and other state and federal policy decisions, over which local governments have no control, are crippling the ability of counties to continue to deliver high quality services on behalf of the state and federal government. While a portion of these costs may be recovered through the Commission on State Mandates, the process is lengthy, requires significant staff time and resources, and if approved by the commission, counties are rarely funded at an adequate level. As such, we respectfully request this bill be amended to include an appropriation of funds sufficient to cover the full costs that local governments will incur for implementation.

For these reasons, RCRC, CSAC, and UCC must oppose AB 2605 as currently drafted. If you should have any questions, please do not hesitate to contact us.

Sincerely,

SARAH DUKETT
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Senior Policy Advocate
sdukett@rcrcnet.org

RYAN MORIMUNE
California State Association of Counties
Senior Legislative Advocate
rmorimune@counties.org

JOSH GAUGER
Urban Counties of California
Legislative Representative
jdg@hbeadvocacy.com

cc: The Honorable Joaquin Arambula, Member of the California State Assembly
Members, Assembly Local Government Committee
Angela Mapp, Chief Consultant, Assembly Local Government Committee
Tobias Wolken, Consultant, Assembly Republican Caucus

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

April 7, 2026

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

RE: AB 1617 (Alanis) Household hazardous waste: reporting
As introduced on January 21, 2026 – SUPPORT

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we are pleased to support Assembly Bill 1617 (Alanis) regarding household hazardous waste reporting.

Currently, local household hazardous waste collection facilities are required to submit annual reports to both the Department of Resources and Recycling (CalRecycle) and the Department of Toxic Substances Control (DTSC). Although the reporting requirements are nearly identical, the two agencies operate on different reporting cycles—fiscal year for CalRecycle and calendar year for DTSC—resulting in unnecessary administrative burdens for local agencies.

AB 1617 would align the reporting periods for both agencies, streamlining compliance and reducing unnecessary workload and administrative costs for local governments. For these reasons, we are pleased to support AB 1617.

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

April 8, 2026

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

RE: **AB 1881 (Ramos): California Indian Freedom Act of 2026.**
Notice of OPPOSE UNLESS AMENDED *(As Introduced on January 12, 2026)*

Dear Assemblymember Kalra,

The undersigned organizations must respectfully convey our **Oppose Unless Amended** position on AB 1881 (Ramos), which would make significant changes in state law regarding tribal religious freedoms, tribal consultation, and confidentiality related to tribal cultural resources and information. ***While we are concerned about the bill in print as of January 12, 2026, we have been working diligently with the author on forthcoming amendments that should address some of our concerns about the scope of the bill.*** Our concerns with the current bill include the following reasons:

AB 1881 Duplicates and Conflicts with Existing State and Federal Laws that Already Provide for Tribal Protections and Tribal Consultation.
Under existing federal law that applies in California, the Religious Land Use and Institutionalized Persons Act of 2000 (RLUIPA), prohibits government agencies from imposing or implementing a land use regulation in a manner that imposes a substantial burden on the religious exercise of a person, including a religious assembly or institution, unless it is demonstrated that the imposition of the burden is in furtherance of a compelling governmental interest and the least restrictive means of furthering that interest.

Under Public Resources Code §5097.9, state law prohibits a public agency or private party using or occupying, or operating on, public property, under a public license, permit, grant, lease, or contract made on or after July 1, 1977, from interfering with the free expression or exercise of Native American religion, as provided in the United States Constitution and California Constitution. A public agency or private party is also prohibited from causing severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require.

Additionally, California Environmental Quality Act (CEQA) provides a framework for the assessment of environmental impacts from projects that require discretionary action and provides for public disclosure of those environmental impacts, including proposed mitigation measures and project alternatives as part of the overall project analysis. Lead agencies must follow a formal process for early government-to-government consultation with California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project as part of the environmental review process under CEQA. The bill would create a duplicative path for tribal consultation outside of the CEQA process and set standards that could result in projects not moving forward. Such provisions like requiring a government agency to "seek and document free, prior, and informed consent from an affected tribe for any project", as well as "adopt mitigation measures approved by the tribe" could drastically constrain projects at the local level.

Lastly, Government Code §7927.000 already requires that records of Native American graves, cemeteries, and sacred places, including those records that are maintained by the Native American Heritage Commission, another state agency, or a local agency are exempt from mandatory public disclosure under the California Public Records Act due to being of historical and cultural significance.

Based on all of these existing laws, AB 1881 would introduce far-reaching and unworkable changes that inhibit government decision-making and conflict with existing state and federal law, including religious freedoms, tribal consultation processes, and confidentiality measures.

AB 1881 Creates a Strict Scrutiny Standard for Tribal Government Interests Above Other Land Use Interests.

AB 1881 would elevate tribal religious freedom of expression, spiritual practices, sacred sties, objects, and ceremonies above all other interests by codifying a strict scrutiny standard for tribal interests. This standard would apply broadly to all state and local governmental actions, including any permitting decision, land use approvals, enforcement actions, environmental review, contracting, licensing, or regulatory activities. This standard to evaluate substantial burden on tribal religious freedom of expression would be borne by the state or local government, rather than the tribal government as is the current practice under RLUIPA and would apply this standard to previously passed or granted determinations, as well as future government decisions. The potential implications of this provision alone would have significant impacts to California's economy, stalling projects and inflating project costs, and placing both the state and local governments at risk of increased litigation with significant, unrecoverable costs.

AB 1881 Invokes a Private Right of Action That Creates Significant New Litigation Exposure.

AB 1881 would authorize a tribal government to assert a violation of the bill by allowing a claim or defense in any judicial or administrative proceeding. This private right of action creates the potential for costly litigation on any project, at any stage, and on any current or future state or local government decision. Private rights of action in land

use law can be used strategically to delay or block projects for reasons unrelated to the statute's protective purpose. The resulting litigation risk will be factored into the cost of every project, further exacerbating and causing widespread affordability challenges.

AB 1881 Applies Statewide to Prior and Future Actions and Eliminates Local Flexibility. The bill would express all of these provisions as a matter of statewide concern and apply to all cities, including charter cities, as well as state government actions. This eliminates local governments from being able to implement existing tribal consultation laws based on local conditions and community characteristics. A one-size-fits-all mandate where the only recourse is litigation actually undermines existing partnerships between local governments and tribal governments. The bill can be interpreted to apply to both prior and future state and local government actions, which is extremely problematic to re-litigate decisions where final determinations have already been made.

AB 1881 Remains Unimplementable and Must be Amended. Our organizations have communicated with the author's office and the sponsors of the bill on the overall goal and intent of the measure. We have a set of amendments that we have proposed to the author and the sponsors based on our discussions with them about the real challenges they are looking to solve. We believe the current bill is beyond the scope of some of the concerns raised in our discussions, which included accessing state properties to perform and practice religious ceremonies, as well as ensuring tribal religious instruments are handled properly when entering state security systems. We are committed to working with the author and sponsors to amend AB 1881 to address these considerations.

For these reasons, our organizations must remain **Opposed to AB 1881 (Ramos) Unless it is Amended.** If you have any questions, do not hesitate to contact this coalition by reaching out to Cal Cities Legislative Advocate Melissa Sparks-Kranz at msparkskranz@calcities.org at 916-658-8232.

Sincerely,

Melissa Sparks-Kranz
Legislative Affairs, Lobbyist
League of California Cities

Charles Delgado
Legislative Advocate
California State Association of Counties

John Kennedy
Senior Policy Advocate
Rural County Representative of California

Amber Rossow
State Relations Advocate
Association of California Water Agencies

Kristopher Anderson
Legislative Advocate
California Chamber of Commerce

Bob Reeb
Executive Director
Valley Ag Water Coalition

Alexandra Biering
Director, Policy Advocacy
California Farm Bureau Federation

Brittany Barsotti
Legislative Representative
California Special Districts Association

cc: The Honorable James Ramos
Members, Assembly Judiciary Committee
Tom Clark, Counsel, Assembly Judiciary Committee
Nicholas Liedtke, Chief Counsel, Assembly Judiciary Committee
Daryl Thomas, Consultant, Assembly Republican Caucus

Proposed Amendments to AB 1881 (Ramos)

SECTION 1. The Legislature finds and declares all of the following:

(a) California is home to the greatest number of California Indians living in the United States, approximately 700,000 according to the 2025 United States Census.

(b) More than 100 Native Nations call California home, each with distinct religions, spiritual traditions, ceremonies, and sacred sites that long predate statehood and continue to be practiced to this day

(c) California Indian religions and spiritual beliefs, like many Indigenous religions, are exercised through land-based practices, including sacred sites and ceremonies tied to specific geographies, and access to cultural landscapes that remain integral to the continued survival of California Indian religions and spiritual practices.

(d) California is committed to safeguarding Indigenous religious freedom, ceremonial practices, sacred sites, cultural patrimony, and access to cultural landscapes as a matter of human rights, environmental justice, and cultural survival.

Section 2. Government Code Section 9110 is amended as follows:

(a) The maintenance and operation of all of the State Capitol Building Annex is under the control of the Department of General Services, subject to this article.

(b) Security of the State Capitol Building Annex is the responsibility of the Department of the California Highway Patrol.

(c)(1) The Department of General Services, in coordination with the Department of Human Resources, shall conduct a training for the California Highway Patrol consistent with subdivision (g) of Government Code Section 11019.81, with regard to tribal governments accessing the State Capitol Building Annex and grounds to be able to honor religious freedoms, ceremonial practices, sacred sites, cultural patrimony, and cultural landscapes.

(2) The training shall include, but not be limited to, how the California Highway Patrol shall properly handle tribal instruments when accessing and entering the State Capitol Building Annex and grounds.

(3) To the greatest extent feasible, the California Highway Patrol shall avoid undue harm to when handling tribal instruments.

Section 3. Government Code Section 11019.81 is amended as follows:

(a) This section shall be known and may be cited as the Government-to-Government Consultation Act.

(b) For purposes of this section, all of the following shall apply:

(1) “Agency action” includes, but is not limited to, agency development of policies, regulations, guidelines, processes, programs, and projects with tribal implications.

(2) “Federally recognized tribe” means a tribe located in the state and acknowledged by the federal government pursuant to the annual list published under the Federally Recognized Indian Tribe List Act of 1994 (25 U.S.C. Sec. 5131) in the Federal Register.

(3) “Tribal implications” are agency actions that impact one or more federally recognized tribes or nonfederally recognized tribes or tribal organizations, the government-to-government relationship between the state and federally recognized tribes, or the distribution of power and responsibilities between the state and federally recognized tribes.

(c) The Legislature encourages the State of California and its agencies to consult on a government-to-government basis with federally recognized tribes, and to consult with nonfederally recognized tribes and tribal organizations, as appropriate, in order to allow tribal

officials the opportunity to provide meaningful and timely input in the development of policies, processes, programs, and projects that have tribal implications.
(d) At the request of a federally recognized tribe for a government-to-government consultation on a specified agency action, the Legislature encourages the state and its agencies to consult with the tribe as to the specified agency action within 60 days of the request.
(e) Each agency director is encouraged to consider the need for tribal consultation before approving an agency action.
(f) (1) Within the executive branch, the following officials shall have authority to represent the state in a tribal government-to-government consultation:
(A) The Governor.
(B) The Attorney General.
(C) Each constitutional officer and statewide elected official.
(D) The director of each state agency and department.
(E) The chair and the executive officer of each state commission and task force.
(F) The chief counsel of any state agency.
(2) Each official authorized by this subdivision may formally designate another agency official to conduct preliminary tribal consultations, and each designated official may have the authority to act on behalf of the state during a government-to-government consultation.
(g) (1) On or before June 1, 2024, the Department of Human Resources, in consultation with state entities experienced in tribal issues and with tribal governments, shall develop a training regarding the required elements of training on government-to-government consultations for the officials specified in subdivision (f).
(2) The training shall include details on government-to-government consultation, including, but not limited to, all of the following elements:
(A) Timing and notice.
(B) Form, including, but not limited to, in-person meetings, video conferences, teleconferences, and written correspondence.
(C) Principles.
(D) Resolution.
(E) Tribal sovereignty.
(F) Sacred sites.
(G) Changes or updates to state law that affect California tribes and that would require government-to-government consultation.
(h) All officials listed in subdivision (f) shall complete the training on government-to-government consultation by January 1, 2025, or, for officials appointed after that date, within six months of their appointment or confirmation of appointment, whichever is later. Each official shall retake the training annually.
(i) (1) Consistent with the Tribal Consultation Policy of the Department of General Services, the department shall consult on a government-to-government basis with federally recognized tribes, non-federally recognized tribes and tribal organizations, as appropriate, in order to allow tribal officials to request the opportunity to access state lands, properties, or sites for the purposes of practicing religious freedoms.
(2) The department shall consult with a tribe government within 60 days of the request.

April 6, 2026

The Honorable Isaac Bryan
Chair, Assembly Committee on Natural Resources
1020 N Street, Room 164
Sacramento, CA 95814

RE: AB 1934 (Bennett) State Fire Marshal: home hardening certification program implementation plan.
As amended on March 25, 2026 – SUPPORT
To be heard in the Assembly Natural Resources Committee on April 13, 2026

Dear Chair Bryan,

The California State Association of Counties (CSAC), League of California Cities (Cal Cities), and Rural County Representatives of California (RCRC) write in **support** of Assembly Bill 1934 (Bennett) regarding a home hardening certification program implementation plan.

AB 1934 would require the State Fire Marshal's Wildfire Mitigation Advisory Committee to develop an implementation plan for a home hardening certification program by January 1, 2028, and provide a report on its findings and recommendations. The implementation plan would identify home hardening measures, including defensible space, that can be voluntarily implemented during renovation and/or property improvement projects to substantially reduce the risk of loss during a fire and bring existing building stock into alignment with state building standards for wildland-urban interface (WUI) areas.

California local governments support the establishment of a statewide home hardening certification program and implementation plan because it would provide a clear, science-based standard for reducing wildfire risk to existing homes, strengthening community resilience while helping residents make informed investments in safety. A uniform certification would also improve eligibility for insurance incentives; however, property-level and communitywide wildfire risk mitigation efforts still need to be accounted for in insurance rates and formalized in an update to the Safer from Wildfires regulations. By lowering structure loss during wildfires, home hardening ultimately protects lives and reduces the long-term public costs of disaster response and recovery.

For these reasons, we are pleased to support AB 1934. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org, Jolena Voorhis (Cal Cities) at jvoorhis@calcities.org, or Staci Heaton (RCRC) at sheaton@rcrcnet.org.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

Jolena Voorhis
Legislative Advocate
League of California Cities

Staci Heaton
Senior Policy Advocate
Rural County Representatives of California

CC: The Honorable Steve Bennett, Member of the California State Assembly
Members, Assembly Natural Resources Committee

April 7, 2026

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

RE: **AB 1938 (Irwin): Coastal recreation: designated state surfing reserves.**
Notice of SUPPORT IF AMENDED *(As Amended on March 25, 2026)*

Dear Chair Wicks,

On behalf of the League of California Cities (Cal Cities) and the California State Association of Counties (CSAC), we write to express our **support if amended position** for **AB 1938 (Irwin)**, related to designated surfing reserves along California's coastline. While our organizations represent cities and counties statewide, we work closely with the 76 coastal cities and counties on issues affecting California's unique and valuable coastal resources.

AB 1938 would require the Ocean Protection Council (OPC) to establish criteria and an application process by July 1, 2027, for the purpose of designating state surfing reserves. The bill authorizes local governments, after adopting a formal resolution, to apply to the OPC to designate areas within their jurisdiction as surfing reserves. The OPC would be required to approve applications that meet the established criteria, ensuring a clear and predictable process for local governments.

Preserving the integrity and unique culture of California's coastline is highly valued among coastal jurisdictions. AB 1938 appropriately recognizes the important role local governments play in identifying, managing, and protecting coastal resources, including surf areas that hold cultural, recreational, and economic significance to their communities. We appreciate that the bill centers local governments in the application process and requires coordination between the state and local jurisdictions, including partnering on implementation efforts such as signage and public awareness. This collaborative framework will help ensure that designations reflect local conditions, existing planning efforts, and community priorities.

We appreciate the author's continued engagement with local governments and stakeholders as the bill has evolved. As criteria are developed pursuant to this bill, it will be important to ensure there are opportunities for input from local governments and other coastal stakeholders. Continued engagement will help ensure the criteria align with local conditions and existing surf areas and support a program that is both effective and widely utilized by coastal communities. A collaborative approach will help ensure the program is both meaningful and widely utilized by coastal communities.

For these reasons, we have a **support if amended** position on **AB 1938 (Irwin)**. If you have any questions, please contact Melissa Sparks-Kranz at msparkskranz@calcities.org or Jordan Wells at jwells@counties.org.

Sincerely,

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

Jordan Wells
Legislative Advocate
California State Association of Counties

cc: The Honorable Jacqui Irwin
Members, Assembly Appropriations Committee

April 8, 2026

The Honorable Diane Papan
Chair, Assembly Water, Parks, and Wildlife Committee
1020 N Street, Suite 160
Sacramento, CA 95814

RE: **AB 2254 (Addis): Coastal resources: local coastal program: monarch butterfly habitat.**
Notice of OPPOSE UNLESS AMENDED (*As Amended April 8, 2026)*

Dear Assemblymember Papan,

The League of California Cities (Cal Cities), the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC) respectfully submit our **Oppose Unless Amended position on AB 2254 (Addis)**, which would mandate upon the next update of a local coastal program (LCPs) to incorporate policies to protect the overwintering habitat sites of monarch butterflies.

Under the California Coastal Act, LCPs are critically important planning tools that serve as long-term land use plans that contain high level policies for how to balance coastal resources, community development, and public access. In representing the 76 coastal cities and counties, LCP updates are a challenging and time intensive process for local governments to gain Coastal Commission (Commission) certification and approval to retain local permitting authority in the coastal zone.

Under existing law, the California Endangered Species Act (CESA) aims to protect native species and their habitats threatened with extinction. The law prohibits the unauthorized "take" of listed species, covering over 250 species of plants, animals, and invertebrates. Currently, neither monarch butterflies are listed as candidate, threatened, or endangered species, nor are their overwintering habitat sites covered under CESA.

AB 2254 would mandate upon their next update of their LCP that occurs on and after July 1, 2027, a local government, with a monarch butterfly overwintering habitat site located within their jurisdiction and the coastal zone as determined based on a dataset developed by the California Department of Fish and Wildlife (CDFW), would be required to include such monarch butterfly overwintering habitat site protection policies in their LCP. The bill would require the Commission to develop and provide guidance on model policies on or before July 1, 2027 to be used by a local government to protect monarch butterfly overwintering habitat sites.

While the author's goal may be well-intended, AB 2254 is deeply problematic for the following reasons:

1. **AB 2254 sets a flawed precedent of mandating extensive LCP updates to be completed by local governments based on a lack of scientific backing under the state's most protective environmental species law, CESA.** If the author would like to have the monarch butterfly and their overwintering habitat sites protected, the existing process to list the species under CESA must be the pursued first before mandating local governments update their LCPs to include policies to address species concerns. The process of listing a species under CESA involves submitting a scientific petition to the Fish and Game Commission, followed by a 90-day review by CDFW, a candidate evaluation period, and a final decision by the Fish and Game Commission. The process requires evidence of threats, population trends, and habitat needs, providing temporary protection during the evaluation. *Without these scientific analyses, mandating local governments to update LCPs with specific policies is unjustifiable.* At a minimum, CDFW should explore a pathway for listing the species or providing greater, consistent habitat protections at the state level.

2. **AB 2254 mandates an extensive LCP update based off of a 'moving target' dataset provided by the state.** Currently, the bill requires CDFW to provide the dataset of the overwintering sites and mandates local governments develop their LCP policies based on this data. This is a fundamentally flawed approach that presents a 'moving target' whenever the dataset is updated, a local government would be required to update their LCP again based on changes in data.

3. **AB 2254 inaccurately assumes updated LCPs will provide the greatest protections for habitat sites.** LCPs are not site-specific plans – they are long-range land use planning documents intended to guide decision-making and permitting in the coastal zone. If there are overwintering specific sites that need greater protection, the development of habitat management plans would be the most appropriate planning mechanism to provide specific protection or mitigations for such sites. There are already local governments that have existing habitat management plans for monarch butterflies and their overwintering sites, which is a more appropriate planning tool to address site specific issues.

4. **AB 2254 presumes that monarch butterfly overwintering habitat is bound to the coastal zone which could lead to both duplicative and disparate planning efforts, rather than looking at specific habitat sites holistically.** Such overwintering sites are currently identified by CDFW both within and outside of the coastal zone. By only requiring LCPs to be updated would neglect managing these sites holistically for those areas outside the coastal zone. This could lead to planning efforts that do not address the full extent of concerns at a specific site. Again, some local governments already have habitat management plans and mandating LCP updates would present a duplicative planning efforts that fundamentally would not result in greater protections.

5. **AB 2254 mandates an LCP update during a time when local governments are working diligently to complete existing LCP updates to address sea level rise**

planning efforts. While monarch butterfly overwintering habitats can be found in California, the most pressing and potentially most catastrophic impact to the coastline is the threat of sea level rise. Local governments are already mandated to develop sea level rise plans as part of their LCPs in the next eight years. This was a specific goal and priority set by the Legislature. Adding more LCP mandates on coastal local governments will only deter from successfully meeting existing LCP sea level rise planning requirements by taking away significant time, staffing, and resources for coastal jurisdictions.

Our organizations respectfully request the author amend the bill to do the following: require CDFW and the Commission work together to develop a report to analyze the overwintering habitat sites along the coast, evaluate the appropriate path to listing the species under CESA, identify the types of habitat management plans or policies that are currently in place by local governments, and assess the appropriate approaches to offer increased guidance from the state to local governments. Without taking any of these initial steps, requiring coastal jurisdictions to complete such LCP updates is unsupported to address the very issue the bill aims to solve.

At this time, Cal Cities, CSAC, and RCRC must respectfully **Oppose AB 2254 Unless Amended**. We are available to discuss our comments by contacting Melissa Sparks-Kranz (Cal Cities) at msparkskranz@calcities.org, Jordan Wells (CSAC) at jwells@counties.org, and Staci Heaton (RCRC) at sheaton@rcrcnet.org.

Sincerely,

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

Jordan Wells
Legislative Advocate
California State Association of Counties

Staci Heaton
Senior Policy Advocate
Rural County Representatives of California

cc: The Honorable Dawn Addis
Members, Assembly Water, Parks, and Wildlife Committee
Sean Clair, CA CST Fellow, Assembly Water, Parks, and Wildlife Committee
Brent Finkel, Consultant, Assembly Republican Caucus

April 6, 2026

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

RE: AB 2447 (Bauer-Kahan) – Oppose

Dear Chair Connolly:

On behalf of California's farmers, ranchers, processors, and allied agricultural businesses, we must respectfully oppose AB 2447. As residents of agricultural and rural communities, we share the goal of protecting groundwater quality and ensuring safe drinking water for all Californians. For this reason, we have engaged with the State Water Resources Control Board (State Water Board) and regional water boards for decades to investigate, monitor and attempt to remedy long-standing water quality issues across the State. And while we share your interest in hastening this process, we express our concerns here with the approach proposed in AB 2447.

First, AB 2447 is premised on an incorrect assumption that nitrogen discharges from irrigated agriculture are unregulated. Contrary to this assumption, California agriculture operates under one of the most comprehensive regulatory frameworks in the nation. Starting in or around 2003, discharges of waste from irrigated agricultural operations have been regulated by regional water quality control boards through Conditional Waivers or Waste Discharge Requirements. Such regulatory requirements have evolved over time resulting in today's comprehensive Irrigated Lands Regulatory Program (ILRP), which is administered by the State Water Board and the regional boards.

Under the current program, agriculture throughout California is regulated through Waste Discharge Requirements, which require various levels of enrollment, surface and groundwater monitoring, Irrigation and Nitrogen Management Plans, Farm Plans, nitrogen applied reporting and more. Through the ILRP, more than 30,000 farms and ranches are enrolled statewide, covering millions of irrigated acres. Based on State Water Board data, to date 89% of irrigated farmland is currently enrolled in ILRP, with the remaining to be enrolled soon.[1]

In some regions, third party coalitions help to administer these programs and coordinate efforts amongst vast agricultural acreages. The leading example of coalition efforts occurs in the Central Valley where there are 14 coalitions working with over 25,000 individual grower operations covering over 5 million acres of irrigated farmland. The Central Valley coalitions collect nitrate application and crop yield data from their growers to estimate the amount of nitrate that may potentially leach to groundwater or runoff into surface water. Once the data is collected, the coalitions annually submit this information, along with detailed analysis of the information, to the Central Valley Regional Water Quality Control Board (Central Valley Water Board). The Central Valley Water Board reviews this information for its accuracy, conducts farm inspections, evaluates grower compliance, and brings enforcement actions against non-compliant growers when necessary.

Moreover, coalitions regularly conduct surface and groundwater monitoring, per a methodology directed in WDRs. Groundwater monitoring includes requirements on growers to individually test on-farm domestic wells for nitrate and provide notice to those reliant on domestic wells if the well exceeds the nitrate drinking water standard. In the Central Valley, through the region's preeminent Nitrate Control Program, growers along with other nitrate dischargers, offer free domestic well testing and replacement drinking water as an interim approach for those reliant on groundwater. There are also significant efforts taking place to identify and implement long-term drinking water solutions.

To date, substantial progress has been made by growers, coalitions and other third-party groups in all facets of ILRP. Specifically, irrigated lands coalitions working with the Central Valley Water Board have achieved the following in recent years:

- Completed Groundwater Quality Assessment Reports to delineate areas across the Central Valley that are vulnerable to nitrate contamination and characterize current groundwater quality conditions
- Established Groundwater Trend Monitoring programs to track changes in groundwater quality
- Established annual grower-reporting programs to understand trends in implemented practices and nitrogen application ("A") and removal ("R") rates for all parcels enrolled in the ILRP
- Developed Management Practice Evaluation Programs to identify, evaluate, and promote practices that are protective of groundwater quality
- Created a robust and comprehensive Groundwater Protection Formula, Values, and Targets approach to estimate current nitrate discharge rates at the field-scale and consider local hydrologic conditions; establish and routinely revise (every five years) targeted township-based

[1] https://www.waterboards.ca.gov/about_us/performance_report_2122/regulate/241_irrigated_lands.html

(6-mile x 6-mile) discharge rates that are protective of groundwater quality; and track progress towards these Targets over time
- Proposed crop-specific Acceptable Ranges of A/R to establish agronomically appropriate nitrogen use efficiencies based on research and the current grower-reported distribution of A/R ratios by crop and identify growers outside of the Acceptable Ranges for follow-up actions
- Established Groundwater Quality Management Plans to synthetize the above information into coherent plans to manage irrigated agriculture's impact on groundwater quality
- Conduct annual, ongoing grower outreach and education to inform growers of the need to protect groundwater quality from the impacts of nitrogen applications through the use of best management practices

This framework integrates monitoring, detailed reporting, state of the art modeling, local water quality, individual grower-based efficiency metrics, and outreach and education to growers and their advisors to chart a clear path forward towards protecting water quality while sustaining a vibrant agricultural landscape. Such accomplishments represent a substantial body of work that informs the collective understanding of the state of nitrate issues and what is needed to address them. Considering the regulatory systems currently established and its successes to date, the claim that nitrogen application is unregulated is simply inaccurate.

Second, to assume the State Water Board and regional boards are relying on the status quo to address water quality issues is also a falsehood. The State Water Board recently convened the Second Statewide Agricultural Expert Panel to evaluate nitrogen management, and feasible regulatory metrics. This panel, consisting of scientists, agronomists, university researchers and nutrient management experts have been evaluating vast amounts of data collected through the ILRP, taking public testimony, and are developing their final expert recommendations to the State Water Board. Their process is set to be completed no later than June of this year. AB 2447 would effectively pre-judge and override this time intensive, objective, technical process by imposing prescriptive statewide mandates before scientific consensus and feasibility determinations are complete. Legislatively mandating specific nitrogen discharge standards on an accelerated timeline risks replacing an evidence-based approach with statutory rigidity.

AB 2447 also seeks to undermine a key tenant of the ILRP—a recognition that farm-level nitrogen application information is highly sensitive operational data and publicly disclosing this data at an individual level creates significant risk without improving environmental outcomes. Because of the proprietary nature of farm characteristics reflected in nitrogen application rates (crop type, rotational strategy, yield, irrigation and soil management techniques, etc.), much of the reporting under ILRP is currently managed by coalitions. Notably, all grower data is reported to the regional water boards. However, in some regions, the data is anonymized on a grower level and parcel level before being submitted to the respective regional board. Although anonymous, the regional water boards have sufficient information to evaluate grower compliance with WDRs and have the ability to identify growers that are not making improvements towards protecting groundwater and surface water quality. This approach has been found to be appropriate by the State Water Board and the courts because it incentives grower participation in coalitions, promotes accuracy in reporting, allows coalitions to work directly with growers, and provides the State Water Board and regional boards with data and information necessary to evaluate the efficacy of the ILRP.

Beyond duplication, AB 2447 requires compliance with strict standards under an impossible timeline. Simply put, under current agricultural practices and knowledge, it is nearly impossible for all of California agriculture to comply by the date proposed. AB 2447 requires agricultural operations to "not cause or contribute" to nitrate exceedances, coupled with nitrogen application limits, by 2030. Nitrogen cycling in the soil is influenced by a variety of factors.

AB 2447 would cement in place a one-size-fits-all approach that does not account for the diversity of production, regional hydrogeology, crop nutrient demands, soil mineralization rates, irrigation methods and legacy nitrate issues. This approach will result in disproportionate impacts on growers in certain basins, particularly the Central Valley and coastal regions, creating inequitable burdens for rural communities that already face economic challenges. In 2020, a well-known and respected economics firm evaluated the impact of nitrogen application and discharge limits being considered by the Central Coast Water Board. In their evaluation, the firm looked at the economic impact specifically for Monterey County and lettuce production exclusively. The study found that these restrictions would result in a county-wide economic loss of $683 million annually, job loss of 11,340 positions and the probability of a farm generating revenue greater than costs falls to 14%.
(ERA Economics LLC, 2020).[2] This limited analysis illustrates the magnitude AB 2447 would impose across California by taking the same approach across all commodities and all regions as evaluated by ERA Economics.

Time-over-time, the State Water Board has recognized that even with precision agriculture, cover cropping, and advanced fertigation systems, it is scientifically impossible to guarantee zero contribution to exceedances in every hydrologic setting. This is evidenced by, among other things, the State Water Board's remand of the Central Coast WDR that included limits similar to those being required by AB 2447. In short, the State Water Board remanded the WDR because it found the imposition of such limits to be premature until more information is available. (State Water Board Order WQ 2023-0081).[3] As a result of this decision, the State Water Board created the Second Statewide Ag Expert Panel and charged them with evaluating the potential for limits or targets to be imposed over variable time horizons. As noted previously, the Second Ag Expert Panel is in the middle of developing their final recommendations, which are expected to be finalized by the end of June this year. While we await the final report in June 2026, the panel's draft recommendations released in 2025 found "…based on scientific and technical considerations the Panel recommends that limits are not required statewide or as a precedential tool to be used by Regional Boards."[4]

In addition to the time and agronomic infeasibility of the provisions of AB 2447, the bill would institutionalize an entirely new water quality program and fees to support implementation on a community not healed to bear the new and growing costs. The current water quality program costs in place are funded through fees on farmers. Coalition monitoring, domestic well testing, nitrate replacement water programs and compliance administration already cost the agricultural community tens of millions annually. In addition to pivoting these obligations to the State and regional boards, AB 2447 would increase data reporting requirements, and require an entirely new level of regulatory oversight and enforcement capacity at the regional water boards and the State Water Board. For example, in 2010, the Central Valley Water Board published its Environmental Impact Report for the ILRP as proposed in the Central Valley. As part of the EIR, the Central Valley Water Board had prepared an economic impact analysis of the regulatory alternatives, one which included a program similar to that envisioned by AB 2447. According to that analysis, the Central Valley Water Board alone would need over 400 PYs to implement a program that required individual grower reporting to the Central Valley Water Board.

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[2] ERA Economics LLC, Technical Memorandum: Example Economic Impacts of the Central Coast Water Board Ag Order 4.0, prepared for Kahn, Soares & Conway LLP (Davis, CA: ERA Economics, June 19, 2020) .
[3] State Water Resources Control Board, Order.WQ.8689_6607¿In.the.Matter.of.Review.of.General.Waste.Discharge.Requirements.for.Discharges.from.Irrigated.Lands?Order.No¡.R9_8687_6606?Issued.by.the.California.Regional.Water.Quality.Control.Board?Central.Coast.Region, SWRCB/OCC Files A-2751(a)-(b) (Sept. 20, 2023), https://www.waterboards.ca.gov/public_notices/petitions/water_quality/docs/2023/wqo2023-0081.pdf.
[4] 2025-2026 State Water Resource Control Board. Second Expert Panel, Version 9 Draft Report. https://www.waterboards.ca.gov/water_issues/programs/agriculture/2025-expert-panel.html

The cost of these PYs would be borne by growers, further limiting agriculture's ability to survive economically in a time of increased water costs, increased input costs and depressed commodity prices. Moreover, for many small- and mid-sized farms operating on thin margins, particularly in specialty crops, additional regulatory fees required to implement AB 2447 will exceed their capacity to pay. In regions already facing water scarcity, regulatory expansion, market competition and rising labor costs, this bill will accelerate farm exits and consolidation.

Finally, AB 2447 undermines the role of the coalitions under ILRP and implementation of the Nitrate Control Program. Ultimately, the bill would result in dismantling the coordination and financing for domestic well testing and, where contamination is identified, drinking water replacement for affected households.

In short, nitrate contamination in groundwater is a decadal long challenge for the State regardless of grower practices today. Over the decades, growers have followed and employed the best scientific and state-supported research on application rates and fertilization management practices. Data shows that even if growers applied zero nitrogen fertilizer and essentially stopped farming, water quality issues will persist in some areas for over a hundred years. Importantly, California agriculture is committed to improving water quality, protecting public health and advancing the best precision agricultural practices possible. To that end, the existing ILRP framework, regional orders, coalition monitoring, and ongoing expert review provide a robust and iterative pathway for progress grounded in science and regional adaptability. AB 2447 replaces that adaptive framework with rigid mandates, exposes growers, communities and the state to unsustainable burdens, and generates unintended harm.

For these reasons, we respectfully oppose AB 2447 and urge a collaborative approach that builds upon, rather than dismantles, California's existing regulatory structure.

Sincerely,

Shirley Rowe, President
African American Farmers of California

Tricia Geringer, Vice President of Government Affairs
Agricultural Council of California

David Najarian, President
Alameda County Farm Bureau

Jim Spinetta, President
Amador County Farm Bureau

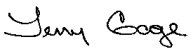
Alexi Rodriguez, President and CEO,
Almond Alliance of California

Cadee Condit, Vice President Government Relations
American Pistachio Growers

Shawn James, President
Butte County Farm Bureau

Lindsay Hyde, BYSWQC Administrator
Butte Yuba Sutter Water Quality Coalition

Rosemary Giannini, President
Calaveras County Farm Bureau



Terry Gage, President
California Agricultural Aircraft Association

Todd Sanders, Executive Director
California Apple Commission
California Blueberry Commission
Olive Growers Council of California
Olive Oil Commission of California

Ruthann Anderson, President/CEO
California Association of Pest Control Advisers

Brooke Palmer, Executive Officer
California Association of Wheat Growers

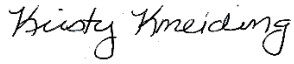
Ken Melban, Vice President of Industry Affairs and Operations
California Avocado Commission

Kristopher M. Anderson, Policy Advocate
California Chamber of Commerce

Jacob Villagomez, Director, Governmental Affairs
California Citrus Mutual

Roger Isom, President/CEO
California Cotton Ginners and Growers Association
Western Tree Nut Association

Darrin Monteiro, Chief Member Relations Officer
California Dairies, Inc.



Kristy Kneiding, Manager
California Date Commission

Alexandra Biering, Senior Policy Advocate
California Farm Bureau

Casey D. Creamer, President
California Fresh Fruit Association

Chris Zanobini, Chief Executive Officer
California Grain & Feed Association

Debra Murdock, President
California Pear Growers Association

Timothy A. Johnson, President/CEO
California Rice Commission

Donna Boggs, Associate Director
California Seed Association

Charles Delgado, Legislative Advocate
California State Association of Counties

Rick Tomlinson, President
California Strawberry Commission

Mike Montna, President/CEO
California Tomato Growers Association

Robert Verloop, Executive Director/CEO
California Walnut Commission

Ann Quinn, Executive Vice President
California Warehouse Association

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Colusa County Farm Bureau

Caitie Diemel, Executive Director
East San Joaquin Water Quality Coalition

Michael Ranalli, President
El Dorado County Farm Bureau

Ryan Jacobsen, CEO
Fresno County Farm Bureau

Chris Linneman, Coordinator
Grassland Drainage Area Coalition

Jocelyn Anderson, President
Glenn County Farm Bureau

Christopher Valadez, President
Grower-Shipper Association of Central California

Jeff Mason, President
Humboldt County Farm Bureau

Rachel Magos, Executive Director
Imperial Valley Irrigated Lands Coalition
Imperial County Farm Bureau

Daniel Suenram
Lake County Farm Bureau

Christina Beckstead, Executive Director
Madera County Farm Bureau

Breanne Vandenberg, Executive Director
Merced County Farm Bureau

Norman C. Groot, Executive Director
Monterey County Farm Bureau

Manuel Cunha, Jr., President
Nisei Farmers League

Kam Bezdek, Legislative Affairs Director
Northern California Water Association

Bruce Houdesheldt, Director of Water Quality
Northern California Water Association,
Sacramento Valley Water Quality Coalition

Debra Murdock, Executive Director
Pacific Egg and Poultry Association

Dave Roberti, President
Plumas-Sierra County Farm Bureau

Robert Reeb
Reeb Government Relations, LLC

Jon Gaeta, Director of State Affairs
RISE (Responsible Industry for a Sound Environment)

Ellen Way, President
Riverside County Farm Bureau

Eric Will, Policy Advocate
Rural County Representatives of California

Walter Hardesty, President
Sacramento County Farm Bureau

Donald Wirz, President
San Benito County Farm Bureau

Jimmy Ukegawa, President
San Diego County Farm Bureau

Les Strojan, President
San Joaquin County Farm Bureau

Ryan Walker, President
Siskiyou County Farm Bureau

Pat Burns, President
Sonoma County Farm Bureau

Kelly Fogarty Tilma, President
Stanislaus County Farm Bureau

Tricia Stever Blattler, Executive Director
Tulare County Farm Bureau

Colton Gaiser, President
Tuolumne County Farm Bureau

Kirti Mutatkar, President/CEO
UnitedAg

Maureen McGuire, CEO
Ventura County Farm Bureau

Noelle Cremers, Director, Environmental and Regulatory Affairs
Wine Institute

Matthew Allen, Vice President, State Government Affairs
Western Growers Association

Renee Pinel, President/CEO
Western Plant Health Association

Brian Greathouse, President
Yuba-Sutter Farm Bureau

cc: The Honorable Rebecca Bauer-Kahan, California State Assembly
Members, Assembly Environmental Safety and Toxic Materials Committee

April 6, 2026

The Honorable Diane Papan
Chair, Assembly Committee on Water, Parks, and Wildlife
1021 O Street, Room 4220
Sacramento, CA 95814

RE: AB 2469 (Papan) Data centers: water use disclosures.
As amended on March 16, 2026 – OPPOSE UNLESS AMENDED
To be heard in the Assembly Water, Parks, and Wildlife Committee on April 14, 2026

Dear Chair Papan,

We write to respectfully inform you of our opposition to your bill AB 2469 unless amended, which would prevent cities and counties from approving a discretionary or ministerial permit for new or expanded data centers unless an applicant provides a water supply assessment that describes the project's estimated water use, and impacts on local water demand.

In general, we support providing more information to local government permitting authorities in order to guide the best possible decision-making outcomes for data centers. We also recognize that the rapid expansion of artificial intelligence data centers poses both potential for economic growth benefiting communities, as well as risks to local energy and water supplies. We support empowering local governments to have the best data possible for permitting these data centers, so that each community can make the land use decisions best suited to their residents.

AB 2469, as currently written, undermines this locally-driven approach by preempting local governments from making permitting decisions in the absence of the extensive new water use assessment process mandated by the bill. Further, the bill forbids new data center projects in areas designated as a critically overdrafted groundwater basin under the Sustainable Groundwater Management Act, absent a waiver from the Department of Water Resources. The problems that this bill is seeking to address are real; the impacts on local utilities from data centers and the potential strain on depleted groundwater supplies are important to factor into land use decisions. However, taking away local authority to permit these projects undermines local governments' ability to protect and represent their communities through established permitting mechanisms and community engagement processes. Local governments are best suited to understand the potential costs and

benefits of data center projects in their communities. The Legislature can best support communities by crafting collaborative efforts to gather more information about projects in a manner that does not unduly constrain local governments.

On its own, the information contained in these assessments would be beneficial to have in order to understand potential impacts of data centers. However, the complexity of the new water use assessments and the conditioning of any new permits upon their completion presents substantial new challenges to city and county departments. Local authorities must review the new components of the permitting application process, a costly new duty for governments that are already under immense budgetary strain and a certain source of delays in the review process as staff work with applicants to ensure that applications are complete. The likely new cost burden of this bill's provisions will place more demands upon staff time in local departments, impacting permits for all projects, not just data centers.

We are open to working with your office to discuss potential changes to this bill that would:

- Preserve local permitting authority,
- Address the proposed state waiver process, and
- Avoid imposing new costs to local governments.

We look forward to any forthcoming conversations as we seek a common solution to enable to the best way forward for properly overseeing data center projects.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

Eric Will
Policy Advocate
Rural County Representatives of California

April 10, 2026

The Honorable Diane Papan
Chair, Assembly Committee on Water, Parks, and Wildlife
1020 N Street, Room 160
Sacramento, CA 95814

RE: AB 2513 (Petrie-Norris) Wildfire: Regional Forest and Fire Capacity Program: local assistance grant program: regional landscape grants.
As amended on April 6, 2026 – SUPPORT

Dear Chair Papan,

On behalf of the California State Association of Counties (CSAC) and League of California Cities (CalCities), we write in support of Assembly Bill 2513 related to wildfire regional landscape local assistance grants.

Effective wildfire mitigation must occur at the parcel, community, and landscape scale because fire does not recognize property lines or jurisdictional boundaries. Coordinated action across these levels reduces overall fuel loads, protects critical infrastructure, improves evacuation safety, and maximizes the effectiveness of public investments in resilience and disaster prevention.

AB 2513 would strengthen the state's efforts to reduce catastrophic wildfire risk through expanded and improved grant programs and local capacity building. These existing programs have successfully funded regional planning, workforce development, and partnership building, enabling local entities to carry out projects that reduce wildfire risk and improve ecosystem resilience. However, local jurisdictions continue to face challenges in scaling up mitigation projects due to limited technical resources and the complexity of grant administration. AB 2513 addresses these challenges by expanding funding, streamlining application processes, and providing additional technical assistance, allowing local entities to implement more projects efficiently and effectively. AB 2513 would also expand the activities eligible for funding to further prevent ignition of wildfire and improve ecosystem health.

For these reasons, we are pleased to support AB 2513. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org or Melissa Sparks-Kranz (CalCities) at msparkskranz@calcities.org

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

March 30, 2026

The Honorable Isaac Bryan
Chair, Assembly Natural Resources Committee
1020 N Street, Room 164
Sacramento, CA 95814

RE: **AB 2517 (Calderon) Fire safety: Fire hazard severity zones.**
Notice of SUPPORT *(As Introduced on February 20, 2026)*

Dear Chair Bryan,

On behalf of the undersigned organizations, we write to express our **support for AB 2517 (Calderon)**, which would improve the Fire Hazard Severity Zone (FHSZ) designation process conducted by the Office of the State Fire Marshal by ensuring consistent and timely updates to the local responsibility area FHSZ maps and establishing a more transparent, publicly accessible process at the state level for developing and releasing these designations.

The threat of wildfires are of growing concern across California, as communities have witnessed the increase in frequency and severity of catastrophic wildfires in the past decade. Under current law, fire hazard severity zone designations are released by the Office of the State Fire Marshal and applied in both the state and local responsibility areas to provide the state's best available science of environmental conditions, such as slope, vegetation, and wind patterns, that can spread a wildfire.

The local responsibility area (LRA) FHSZ designations are only required to be periodically re-reviewed every five years and existing statute does not require comprehensive updates to the designations. Prior to the most recent release in 2025, the LRA FHSZ maps had not been updated over the past 15 years. Important concerns were raised last year when the maps were updated, including the accuracy of land use information, including split parcels with multiple designations and the classification of developed areas such as parking lots and bodies of water being designated as very high fire hazard severity zones. These issues create challenges for local jurisdictions who are required to adopt these maps by ordinance and host public comment locally without the ability to respond to the public concerns regarding the model and data.

AB 2517 would address these concerns by clarifying how and when the LRA FHSZ maps are updated, including how the public can engage meaningfully in the process. The bill would establish a five-year update cycle for the LRA FHSZ maps, a preliminary public release of the maps, require the disclosure of the data, models, and methodology used to develop the designations, and provide opportunities for regional workshops and public comment before maps are transmitted to the local agency for local ordinance adoption. These steps are critical to ensuring public transparency and consistency in how these maps are updated to help protect communities from the threat of wildfires.

For these reasons, the undersigned organizations respectfully **support AB 2517 (Calderon)** and urge your **'AYE'** vote when the bill in heard in committee. If you have any questions, please contact the bill sponsors, the League of California Cities, by reaching out to Legislative Advocate Melissa Sparks-Kranz at msparkskranz@calcities.org or 916-568-8232.

Sincerely,

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities
(sponsor)

Reuben Duarte
Vice President, Policy and Legislation
APA California

Jennifer Capitolo
Executive Director
California Water Association

Matthew Wheeler
Executive Director
California Building Officials

Jordan Wells
Legislative Advocate
CSAC

cc: The Honorable Lisa Calderon
Members, Assembly Natural Resources Committee
Paige Brokaw, Senior Consultant, Assembly Natural Resources Committee
John Fitzpatrick, Policy Consultant, Assembly Republican Caucus

April 6, 2026

The Honorable Gregg Hart
Member, California State Assembly
1021 O Street, Room 6230
Sacramento, CA 95814

RE: Assembly Bill 2569 – OPPOSE
As Introduced February 20, 2026

Dear Assembly Member Hart:

On behalf of the Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), and the California State Association of Counties (CSAC), we must regretfully oppose your Assembly Bill 2569 regarding the California Environmental Quality Act (CEQA).

Assembly Bill 2569 significantly expands CEQA to require consideration and mitigation of the environment's impact on a project. In particular, it expands CEQA to require consideration and mitigation of a direct or indirect exposure of people to a substantial existing or reasonably foreseeable natural hazard or adverse condition of the environment. The bill also requires an environmental impact report to evaluate and mitigate any significant effects that may result from locating the project near, or attracting people to, existing or reasonably foreseeable natural hazards or adverse environmental conditions.

RCRC supports CEQA's core objectives of disclosure, informing the decision-making process, and mitigating a project's significant impacts on the environment. Unfortunately, CEQA is often used for non-environmental purposes to either extract concessions from project applicants or by interested parties to stop a project altogether. All over California, a wide variety of critical projects are subject to endless delays and added costs by those who use CEQA for their own, non-environmental ends. We would welcome the opportunity to discuss how AB 2569 may be able to address some of these existing problems as a precursor.

CEQA challenges impact a wide variety of projects, ranging from food banks to childcare centers to planned parenthood facilities. Other notable challenges have attacked housing, student housing, affordable housing for veterans, etc. CEQA litigation can delay projects for years and add millions of dollars in added costs for the project

proponent. Because of the low bar for bringing and sustaining an action under the "fair argument" standard, even the threat of CEQA litigation can force project developers and lead agencies into much more costly and time-intensive analyses merely intended to bullet-proof the record.

Despite its noble intent, CEQA has become a vital tool for NIMBY groups and project opponents to fight housing, competitors, and essential facilities. In light of the highly litigious world that has developed around CEQA and the way in which it abused, we must strongly oppose AB 2569 because we believe it will merely be used as another tool to oppose and kill vital projects in our communities.

Local governments are vested with the authority and responsibility to make land use decisions within their jurisdictions. As part of that decision-making process, local governments consider and balance competing land uses and risks posed by (and to) the projects under consideration. This process is separate and independent from the CEQA review process, which was designed and intended to reduce a project's impact on the environment. Efforts to address these problems have almost all been thwarted by those who stand to benefit from CEQA's complexity and deference to petitioners. As a result of this stalemate, and to address many of the significant legal, procedural, and economic problems associated with CEQA, many recent bills have sought to eliminate local discretion for particular types of projects – especially in the housing context.

We must regretfully oppose AB 2569 because we fear that it will provide a powerful tool that can be exploited by a wide variety of interest groups to fight housing, critical infrastructure, economic development, and recreational projects. Considering that most of the state has been identified as being at heightened risk for fire, floods, earthquakes, or sea level rise, AB 2569 will further erode the ability for many local governments to meet their Regional Housing Needs Allocation (RHNA) targets. While some of the housing streamlining bills enable developers to bypass CEQA, they do not apply to all areas of the state and are often contingent upon satisfaction of labor standards that are unachievable in many rural communities. As such, AB 2569 creates an even greater risk for housing projects in both rural and urban areas of the state. AB 2569 could also be used to fight critical roads projects to create or expand egress opportunities for existing communities. Because the bill now focuses CEQA on the environment's impact on a project, we fear that this bill could also be exploited to kill projects that are located near manufacturing or industrial areas.

Finally, we believe that AB 2569 is also impractical from a mitigation perspective. It is fairly simple and straightforward (albeit potentially expensive) to mitigate a project's impact on the environment because the means of reducing impacts are within the control of the project developer. On the other hand, having to mitigate the environment's impact on the project, as required by this bill, will be incredibly complex and potentially unachievable. How will a housing development mitigate against the impacts of a manufacturing facility or landfill located half a mile away? How will a park or recreation

project in a high fire risk area mitigate against attracting people to those areas? These are core concerns that must be addressed.

While we must regretfully oppose AB 2569, we believe there is merit to the underlying intent to improve decision-making, convey important information, and improve the safety of our communities. If CEQA was not so prone to misuse, we would be ready to discuss how to better integrate these concepts into CEQA. However, unless and until significant changes are made to CEQA, including fixes to the fair argument standard, document dumping, the administrative record, and timeliness/finality of decisions, we must continue to oppose expanding CEQA as contemplated in AB 2569.

For these reasons, RCRC, Cal Cities, and CSAC must oppose AB 2569 as currently drafted. If you should have any questions, please do not hesitate to contact us.

Sincerely,

JOHN KENNEDY
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MELISSA SPARKS-KRANZ
Legislative Advocate
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CHARLES DELGADO
Legislative Advocate
California State Association of Counties
cdelgado@counties.org

cc: The Honorable Isaac Bryan, Chair, Assembly Natural Resources Committee
Members of the Assembly Natural Resources Committee
Lawrence Lingbloom, Chief Consultant, Assembly Natural Resources Committee
John Fitzpatrick, Consultant, Assembly Republican Caucus

Shaw
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CalAnimals
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California Animal Welfare Association
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URBAN COUNTIES
OF CALIFORNIA

CHEAC
Improving the Health of all Californians

RCRC

CSAC

LEAGUE OF
CALIFORNIA
CITIES

April 2, 2026

The Honorable Juan Alanis

California State Assemblymember, District 22
1021 O St., Ste. 4640
Sacramento, CA 95814

RE: AB 2574 (Alanis) Potentially dangerous and vicious dogs: notice of owner's or keeper's rights – Concerns as amended 4/7/26

Dear Assemblymember Alanis,

On behalf of the California Animal Welfare Association (CalAnimals) and the 280 shelter and animal control agencies we represent, the Urban Counties of California (UCC), the County Health Executives Association of California (CHEAC), the Rural County Representatives of California (RCRC), the California State Association of Counties (CSAC), and the League of California Cities (Cal Cities), we would like to express our concerns on AB 2574, as amended on March 26, 2026. While the removal of the signature requirement and adjustments to the evidentiary standard are positive steps, the bill's provisions requiring statewide compliance with the hearing and appeal framework, expanded court involvement, and additional procedural obligations raise several significant concerns related to cost, implementation, and access to due process.

Statewide Mandate and Fiscal Impact
AB 2574 now requires all cities and counties to comply with the state's hearing and appeal framework, representing a fundamental shift from current law, which allows jurisdictions to adopt local procedures tailored to their operational needs. Existing law allows local governments to adopt their own procedures so long as they are not breed-specific. Many jurisdictions have developed administrative hearing processes that align with their local enforcement structures and court systems.

Requiring every city and county to adopt and comply with the state hearing framework would create a substantial administrative and financial burden for jurisdictions that currently operate under locally established dangerous dog ordinances. Requiring statewide compliance will necessitate changes to local ordinances, retraining of staff, updates to administrative processes, and adherence to new procedural obligations such as posting public hearing notices online, maintaining documentation of notice service, and retaining records for six months after appeal exhaustion. These requirements are likely to create significant new costs for local governments and may trigger reimbursable state mandate claims.

Expansion of Court Involvement and Procedural Complexity
AB 2574 could significantly increase court involvement in cases that are currently handled entirely through local administrative hearings. Expanding the role of the courts in these matters may create unnecessary strain on already burdened superior courts and lengthen the time it takes to resolve cases. Administrative hearings currently allow many disputes to be resolved quickly and efficiently at the local level without requiring court intervention.

However, the amended bill shifts cases toward a more formal, court-aligned structure. Appeals are now directed to the appellate division of the superior court, and prior language making appeal decisions final has been removed, introducing additional procedural layers.

Other provisions—including expanded evidentiary requirements, limits on discovery, and detailed documentation and posting requirements—add complexity. While these changes may strengthen due process, they may also result in longer case timelines and increased demands on local agencies and the court system. Extended timelines could lead to dogs remaining in shelters longer, increasing costs and raising animal welfare concerns.

Reduced Accessibility for Low-Income Pet Owners
Moving aspects of these proceedings closer to the superior court system may unintentionally disadvantage under-resourced community members. Administrative hearings are generally designed to be accessible and navigable without legal representation. In contrast, proceedings that involve court processes can be intimidating and difficult for individuals who cannot afford legal counsel. This shift could make it harder for responsible pet owners to participate effectively in the process and resolve cases in a timely manner. Further, the revised bill's alignment with formal court procedures may favor those with legal resources, while low-income pet owners may face increased barriers to participation. This raises concerns about equitable access to the process.

Existing Due Process Protections
Importantly, jurisdictions already have a legal obligation to provide due process, which includes notifying owners of their rights and the applicable procedures. Many agencies already provide written notices outlining these rights. Existing dangerous dog statutes already incorporate these protections, allowing both administrative and court-based hearings. The determination of ownership is already part of the hearing process, as reflected in the Superior Court's standardized Order After Hearing form, and at this time, we are not aware of evidence that the current framework fails to provide adequate due process protections to dog owners. On the contrary, the amendments to AB 2574 will very likely stall the process of obtaining a PDD/Vicious designation, potentially resulting in shelters having to house dangerous animals for extended periods—posing additional costs, safety risks to staff, and negative impacts on the animals' mental well-being.

Evidentiary Standards and Jury Language
CalAnimals also notes that the bill now applies a preponderance of the evidence standard at the initial hearing, while Section 31622 appears to retain a clear and convincing standard on appeal. We respectfully ask whether this was intentional or an oversight, as applying a higher standard on appeal than at the initial determination is atypical and may create confusion or procedural challenges.

Additionally, the bill removes language in Section 31621 stating that "A jury shall not be available." Clarification would be helpful on whether this change reflects an intent to allow jury proceedings in these cases or was unintended, as it could significantly affect how hearings are conducted and the resources required.

Conclusion
While the goal of ensuring consistent procedures and strong due-process protections is widely shared, the provisions requiring statewide adoption of the state hearing process, expanded court involvement, detailed procedural obligations, and the resulting operational and equity impacts raise significant concerns. In other words, the amendments to AB 2574 may create significant operational challenges for local governments, place additional strain on the court system, and unintentionally reduce accessibility for community members who rely on streamlined administrative processes. Careful consideration should be given to whether these provisions are necessary or whether existing due-process requirements and local administrative systems already achieve the intended goals without imposing new burdens on local agencies, courts, and pet owners.

Sincerely,

Karen Lange
CalAnimals Legislative Advocate

Jean Hurst
UCC Legislative Advocate

Farrah McDaid Ting
Deputy Director of Policy, CHEAC

Tracy Rhine
RCRC Legislative Advocate

Charles Delgado
CSAC Legislative Advocate

Caroline Grinder
Cal Cities Legislative Advocate

CC: Chair and Members, Assembly Judiciary Committee

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

April 9, 2026

The Honorable Diane Papan
Chair, Assembly Committee on Water, Parks, and Wildlife
1020 N Street, Suite 160
Sacramento, CA 95814

RE: AB 2739 (Soria) Water: affordability and system stabilization
As amended April 6, 2026 – Notice of SUPPORT

Dear Chair Papan,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of AB 2739 (Soria).

This bill would establish the Water Affordability and System Stabilization Fund and the Community Water Affordability Program, which are important steps in ensuring that local jurisdictions have the necessary resources to ensure access to clean, affordable drinking water for all residents.

Water affordability and system stability are increasingly interconnected challenges across California. Rising costs associated with infrastructure modernization, climate resilience, regulatory compliance, and energy continue to place pressure on water systems and the communities they serve, especially households living at or near poverty.

AB 2739 proposes a durable, California-based solution by addressing affordability at the household, system, and community levels. The Act advances a sustainable funding solution to support a statewide Low-Income Rate Assistance (LIRA) program for water while also supporting strategic investments that stabilize water systems and help reduce cost pressures before they are passed on to ratepayers.

This bill's proposed funding structure provides predictable, long-term resources without placing new burdens on local governments or water ratepayers. This approach strengthens water planning, reduces reliance on episodic bond measures, and enhances statewide resilience while preserving local decision-making. Further, we support the commitment of the bill sponsors to create a viable, sustainable funding source that does not include any new taxes or fees.

CSAC Officers

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

This bill represents an important step forward in advancing the Human Right to Water by supporting vulnerable households and strengthening the public water systems that serve communities across the state.

For the reasons stated above, CSAC is pleased to support this effort, and we applaud your leadership in advancing this important initiative.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties
cdelgado@counties.org

April 3, 2026

The Honorable Catherine Blakespear
California State Senate
1021 O Street, Room 7720
Sacramento, CA 95814

RE: Senate Bill 1135 (Blakespear) - California Wildlife Coexistence Act - SUPPORT

Dear Senator Blakespear,

On behalf of a broad and diverse coalition of organizations committed to healthy communities, resilient ecosystems, and science-based wildlife stewardship, we are writing in strong support of Senate Bill 1135 to reinstate and expand the state's successful Human-Wildlife Conflict program. Despite the initial program demonstrating effectiveness and winning a state award, one-time funding ran out and the program expired in 2024.

Many species of wild animals flourish in our communities while others are increasingly adapting to urban and suburban living. In a state of nearly 40 million people, California can, and should lead the way in helping wild animals and people coexist peacefully by deploying effective, proactive, and science-based management by the California Department of Fish and Wildlife (CDFW). As communities and wildlife increasingly share landscapes, proactive coexistence strategies are more important than ever. CDFW's wildlife incidence reports (which are a conservative undercounting of real interactions) show an increase in human-wildlife incident reports of 31 percent -- and calls/emails/field contacts up 58 percent -- over the last five years, but staffing declined due to the expiration of limited term program and position funding.

SB 1135, also known as the California Wildlife Coexistence Act, would establish a program at CDFW focused on:

- Responding to wildlife conflicts by tracking incidents and handling calls;
- Preventing and reducing conflicts using nonlethal, science-based, and Indigenous-informed strategies;
- Investigating and analyzing incidents, including depredation and wildlife health issues;
- Maintaining a statewide reporting system for wildlife incidents;
- Supporting local/community efforts with technical assistance and resources; and,
- Conducting public outreach and education

This bill will also codify the current wolf management program at CDFW, ensuring that impacted communities will receive important non-lethal deterrence and financial support as wolves continue their successful return to California. Importantly, SB 1135 sets a minimum threshold of compensation funding for non-lethal deterrence efforts at 50 percent of any appropriated funds and requires non-lethal efforts to be deployed as a condition of eligibility for any compensation for loss. This is important to incentivize livestock owners to pursue appropriate and needed prevention techniques and equipment and only compensates losses that occur in spite of those efforts.

Under this bill, the state would provide regional Human–Wildlife Conflict specialists to serve as trusted messengers to de-escalate community concerns, provide accurate behavior-based information, and guide landowners through practical solutions such as secure enclosures, attractant management, or non-lethal mitigation tools. The loss of these positions in 2024 left Californians without credible, science-informed support during high-pressure situations.

Ensuring communities and people have what they need to keep themselves and domestic animals safe while living alongside wild neighbors has proven to be effective, whereas trying to lethally manage wildlife populations has not. For example, numerous studies cite the fact that indiscriminate killing of native carnivores (such as black bears, coyotes, wolves, and mountain lions) does not stop human-wildlife conflicts—instead, efforts like eliminating access to food attractants (such as garbage or bird feeders), supervising pets, using animal husbandry methods such as electric fences and guard animals, and other nonlethal deterrents are far more effective at preventing conflicts.

A huge body of scientific literature and on-the-ground experience shows that investing in a robust and comprehensive program designed to promote co-existence between people and wildlife at the statewide and regional level produces healthier wildlife populations and greater community acceptance of wildlife. These programs ensure that communities receive consistent and science-based advice so that we avoid putting people and wildlife

at risk. Further, this bill will reduce the likelihood of conflicts arising or increasing, and ultimately lower costs for both the public and our responding agencies and personnel.

Finally, this bill will ensure that organizations and experts with decades of direct, community-based human-wildlife conflict experience will be better positioned to support CDFW staff.

SB 1135 will create a coordinated, statewide program focused on human-wildlife conflict management, emphasizing prevention, data collection, community collaboration, and nonlethal solutions. For these reasons, we strongly support SB 1135 and urge it to be enacted.

Sincerely,

Pam Flick
California Program Director
Defenders of Wildlife
CO-SPONSOR

Elena DeLacy
Executive Director
American River Conservancy

Jennifer Hauge
Senior Legislative Affairs Manager
Animal Legal Defense Fund

Mike Lynes
Director of Public Policy
Audubon California

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Barbara Brydolf
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Sharon Negri
Director
WildFutures

Neal Sharma
Director, California Wildlife Program
Wildlife Conservation Network

Anjali Ranadive
Founder & Executive Director
Women for Wolves

April 7, 2026

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

RE: AB 1821 (Pacheco) California Public Records Act: agency response time.
As Amended April 6, 2026 – SUPPORT
To be heard in the Assembly Judiciary Committee

The California State Association of Counties (CSAC), League of California Cities (Cal Cities),California Municipal Clerks Association (CMCA), Rural County Representatives of California (RCRC), and Urban Counties of California (UCC) are pleased to support Assembly Bill (AB) 1821 by Assemblymember Blanca Pacheco.

The California Public Records Act (CPRA) is a vital tool that enables the public to hold government accountable. Local agencies take these responsibilities seriously and devote substantial resources to responding thoroughly and promptly to public records requests. Our members are committed to transparency and accountability.

AB 1821 provides an important and practical clarification to CPRA response timelines. The bill's shift from "calendar days" to "business days" for initial determinations and extensions is a common-sense update that reflects the operational realities of local agencies. Public agencies generally do not have staff available on weekends or holidays, yet current law continues to toll CPRA deadlines during these periods. A business-day standard ensures agencies have the full, intended number of working days to conduct thorough and accurate searches for disclosable records.

Under existing law, agencies must determine within 10 days whether a request seeks disclosable records, with a possible 14-day extension in unusual circumstances. Neither timeframe accounts for weekends or holidays when staff are unavailable. AB 1821 corrects this discrepancy by converting these periods to business days, helping agencies comply with the law more effectively and consistently.

Local agencies across California have seen a sharp rise in both the volume and complexity of CPRA requests, reporting a 73% increase over five years and noting that more than 90% of agencies have had to divert staff time away from core services to meet these demands. Modern government operations now generate far more disclosable records, including emails, texts, and internal messages, which require extensive searching, review, and redaction of sensitive information such as attorney-client communications, personal identifiers, and medical or criminal data. At the same time, agencies have lost key revenue sources that once offset these costs: Proposition 42 eliminated state reimbursement for CPRA compliance, and a 2020 California Supreme Court ruling restricted agencies from recovering staff time or technical costs associated with producing records. As a result, local governments must absorb the full cost of increasingly time-intensive requests.

Prior to the April 6 amendments, AB 1821 would have addressed this critical issue by allowing agencies to recover reasonable costs for exceptionally burdensome searches. While that provision is no longer included, we appreciate the author's efforts and remain committed to continued conversations about broader CPRA reform. The business-day clarification that remains in the bill is a narrow but meaningful improvement that will help agencies comply with the law more effectively and consistently.

For these reasons, CSAC, Cal Cities, CMCA, RCRC, and UCC are pleased to support AB 1821 and respectfully request your AYE vote. If you have any questions regarding our position, please do not hesitate to contact us.

Sincerely,

Eric Lawyer
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Johnnie Pina
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Jean Hurst
Legislative Representative
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cc: The Honorable Blanca Pacheco, Member, California State Assembly
Members, Assembly Judiciary Committee
Nicholas Liedtke, Chief Counsel, Assembly Judiciary Committee
Liz Enea, Consultant, Assembly Republican Caucus

April 9, 2026

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

Re: **AB 1883 (Bryan): Workplace surveillance tools.**
As amended March 12, 2026 – OPPOSE
To be heard in Assembly Committee on Privacy and Consumer Protection on April 16, 2026

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), League of California Cities (Cal Cities), the Association of California Healthcare Districts (ACHD), County Health Executives Association of California (CHEAC), California Association of Joint Powers Authorities (CAJPA), and Public Risk Innovation, Solutions, and Management (PRISM), we write in respectful opposition to AB 1883 (Bryan), which could 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.

We have fundamental concerns with this and other bills that aim to restrict how public agencies can use the tools defined as "workplace surveillance tools," which we believe are essential and, in many cases, routine tools used for security.

- We oppose any legislation that will compromise health, safety, and security for our employees, the public we serve, and our officials.

- We oppose any legislation that compromises our ability to conduct investigations into fraud, waste, or abuse.
- We do not believe it is appropriate to regulate tools used for security and basic operations in response to private sector labor concerns. State law has protected the right of public employees to bargain and public employees have a property interest in their position that is protected by due process[1].

AB 1883 would impose several rules on how public agencies may use surveillance tools – a term that is vast in its application, including video cameras, ID badge or key fob access, digital workplace messaging collaboration platforms (e.g. Microsoft Teams or Slack), and a wide array of tools used to keep workplaces safe, conduct essential government services, and protect against abuse, fraud, and waste of public resources.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life, particularly as new technologies emerge. However, we are concerned that this bill and others aimed at limiting employer surveillance are too broad, too expensive, and too dangerous for public agencies and those we serve.

Could prohibit routine security or public health tools

It is unclear how a court could interpret the meaning of this bill. While we understand and sympathize with the concerns this bill intends to address, our concern is that a reasonable interpretation could blanketly prohibit routine tools used for security, operations, or public health.

Routine security tools like security cameras, key fobs, ID badges, digital workplace collaboration platforms (e.g. Teams or Slack), or GPS trackers passively collect worker data, including when they are actively working at a computer or cell phone or where they are at a given point in a day. Section 1581(a)(1)(B) **prohibits** any tool that *identifies* or *infers* information about workers engaging in activity protected by state or federal law.

We believe it is critical to protect the civil and labor rights of the public workforce. For local agencies, state law already prohibits public agencies from discriminating, or threatening to discriminate against, public employees who exercise their rights to organize[2]. Our concern is that an overbroad interpretation of what it means to

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194
[2] Government Code §§ 3506 & 3506.5

"identify," or "infer," worker information could endanger essential tools that, while not *designed* or *used* to intentionally undermine the rights of employees, may passively collect information that happens to meet the law's threshold for an outright ban on their use.

While some technologies identified in the bill conjure images from science fiction, we are concerned that their breadth could sweep in routine or innocuous technologies and have other unforeseen operational or safety consequences for public agencies. For example, the current definition for "emotion recognition technology," includes tools that use heart rate to infer or predict a worker's state. This definition could easily apply to tools used regularly in health care settings to predict symptoms and care needed to keep an individual healthy.

Inappropriately applies to public agencies
The sponsors are advancing this bill, in part, to address activities by employers that undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union organizing and bargaining 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.

Exposes public agencies to severe litigation risk and steep penalties
AB 1883 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague, sweeping, and littered with unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per employee for each violation. The County of Los Angeles employs over 100,000. A single violation to the county would cost upwards of $50,000,000.

Put simply, existing law already protects the civil and labor rights of the public workforce. We are concerned this bill could have unintended consequences that limit or prohibit essential tools used to keep employees and the public safe and thriving.

For these reasons, we are firmly **opposed** to AB 1883 and urge your "NO" vote.

Sincerely,

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

Jean Hurst
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Aaron Avery
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CC: The Honorable Isaac Bryan, Member, California State Assembly
Members and Consultants, Assembly Committee on Privacy and Consumer Protection
Josh Tosney, Chief Consultant, Assembly Committee on Privacy and Consumer Protection
Liz Enea, Policy Consultant, Assembly Republican Caucus

April 9, 2026

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

Re: **AB 2027 (Ward): Worker data: prohibitions: artificial intelligence.**
As amended March 16, 2026 – OPPOSE
To be heard in Assembly Committee on Privacy and Consumer Protection on April 16, 2026

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), Association of California Healthcare Districts (ACHD), and League of California Cities (Cal Cities) we write in respectful opposition to AB 2027 (Ward), which would cause an effective ban on the use of an artificial intelligence (AI) tool by a public agency.

We understand the reasonable concerns about the slow creep of new technologies into daily life. However, the scope of this bill is vast and could effectively ban any tool that is developed with the input of workers. Local agency employers are incorporating AI and automated decision system (ADS) technology to improve service delivery, address risks, and empower employees to focus on more meaningful work through streamlining some rote aspects of job duties. State law has protected the right of public employees to bargain, and public employees have a property interest in their position that is protected by due process[1]. Public agencies and their workforce have long bargained over the conditions of their workplace and, more frequently, we have seen MOUs include agreements on the use of AI or ADS.

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

A complete ban on artificial intelligence tools for the uses specified in the bill, when trained with worker data that relates to or describes how a worker performs their job duties, would be detrimental to the development of tools that assist public employers in streamlining and supporting essential services, such as benefits enrollment, resume screening, timekeeping and scheduling, and even systems to detect wildfires and monitor dam safety. AI systems rely on data inputs in order to train them to work effectively. It is hard to fathom how they could function effectively without the input of the public employees and officials with firsthand knowledge of and experience on how to deliver a service or manage risks. Collectively, the terms replication, automation, and replacement, coupled with the bill's defined terms, may extend this bill's application to vast swaths of AI technology uses, including for efficiency and safety, as well as innocuous uses and legacy automated technologies.

These new tools represent a new era of service delivery. As the public sector workforce adopts new technologies, we ask that legislation not hinder the use or potential use of innovations that are already proving to support critical public sector operations.

Additionally, we have concerns regarding the bill's provision that holds employers jointly and severally liable for a vendor's breach in data security or unauthorized system access. While it is appropriate for a vendor to implement and maintain reasonable security procedures to protect worker data, employers do not control the internal systems or security practices for third party vendors, and placing the burden of liability on a public agency for actions it does not have direct control over is misplaced.

Finally, AB 2027 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague and sweeping, and which will result in unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per worker for each violation. The County of Los Angeles employs over 100,000 workers. A single violation to the county would cost upwards of $50,000,000. The bill also subjects public agencies to civil actions, opening them up to liability for punitive damages and attorney's fees. The inclusion of independent contractors in the definition of "worker" blurs the roles of employer and workers, while increasing compliance complications as well as increasing litigation risk.

We are concerned AB 2027 could have vast unintended consequences that prohibit innovation and tools used to assist employees and ensure access to public benefits.

For these reasons, we are firmly **opposed** to AB 2027 and urge your "NO" vote.

Sincerely,

Eric Lawyer
Legislative Advocate
California State Association of Counties
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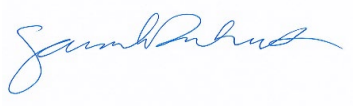
Jean Hurst
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com



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Legislative Advocate
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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Assembly Committee on Privacy and Consumer Protection
Josh Tosney, Chief Consultant, Assembly Committee on Privacy and Consumer Protection
Liz Enea, Policy Consultant, Assembly Republican Caucus

April 6, 2026

The Honorable Rhodesia Ransom
Chair, Assembly Committee on Emergency Management
1020 N Street, Room 360B
Sacramento, CA 95814

RE: AB 2341 (Fong) Local government: emergency response services: use of languages other than English.
As amended March 16, 2026 – SUPPORT
To be heard in the Assembly Committee on Emergency Management on April 13, 2026

Dear Chair Ransom,

On behalf of the California State Association of Counties (CSAC) (sponsor) and Urban Counties of California (UCC), we are proud to support AB 2341 (Fong), which will provide critical clarity to ensure that cities and counties provide emergency notices in languages other than English according to the needs of their local population.

AB 1638 (Chapter 587, Statutes of 2023) requires that a city, county, or city and county provide information related to an emergency in languages other than English spoken by members of their community. The bill was intended to reduce language barriers, ensuring that critical information is accessible to those who speak English less than "very well," during an emergency.

While the law was intended to require translation into the top language(s) spoken other than English, specifically at least five percent of a city or county, late amendments created confusion about which languages must be translated. One reading of the law could require that every single language included in the American Community Survey (ACS) is required to be translated, causing local agencies to translate dozens of languages during an emergency. This could cause significant problems, consuming vast public resources during a crisis and, more importantly, crowding out information for those who most need it.

Many local agencies use phone notifications during an emergency, delivering information via text or phone calls directly. If a county uses text or phone call notices to residents, they may have to deliver that notice in well over thirty languages under a reading of the current law.

This could create unnecessary confusion or fatigue, causing residents to miss crucial notification about the emergency.

AB 2341 would fix this problem, ensuring that emergency translations are delivered into languages spoken by at least five percent of speakers with translation needs – defined as those that speak English less than "very well." The bill provides vital clarity for public agencies and ensures the law can meet its intended purpose: to deliver rapid emergency notices in languages most commonly spoken in a city or county.

For these reasons, we are proud to support AB 2341 (Fong) and urge your "aye" vote.

Sincerely,

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

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

CC: The Honorable Mike Fong, Member, California State Assembly
Members and Consultants, Assembly Committee on Emergency Management
Ryan Flemming, Chief Consultant, Assembly Committee on Emergency Management
Rose Rastbaf, Policy Consultant, Assembly Republican Caucus

April 10, 2026

The Honorable Rebecca Bauer-Kahan
Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

Re: **Assembly Bill 2545 (Schiavo). Report: labor force impact: artificial intelligence.**
Support if Amended
To be heard in the Assembly Privacy and Consumer Protection Committee

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC) and Urban Counties of California (UCC), and the League of California Cities (Cal Cities), we write to express our "support if amended" position to Assembly Bill 2545 (Schiavo), related to the impact of artificial intelligence (AI) on California's workforce. We appreciate the Assemblymember's leadership in this area and efforts to fully understand critical information about how the introduction of AI systems impacts individual workers and labor markets broadly, along with workforce replacement and the existing and missing data collection on impacts. However, we respectfully request that local agency employers be added to the proposed advisory panel to ensure the recommendations to the Legislature reflect a more complete assessment of how AI is used in the workplace.

AB 2545 would establish the California Artificial Intelligence Worker Impact Data Assessment Project Advisory Panel to be composed of representatives from academia, AI program developers, various non-profits, and public and private labor organizations. In light of the intended goals of AB 2545 to determine accurate, comprehensive data to protect workers and support strong workforce pathways through a proactive, evidence-based approach, leaving out local public agency employers would present a major gap in any finding. Since millions of employees serve in positions with the more than 6,000 agencies representing cities, counties,

special districts and schools, the voice of local public agency employers should be included.

Thank you for your consideration of our requested amendments. We look forward to working with the author to advance this measure with an advisory body reflecting a more complete representation of voices in California's workforce stakeholders.

Sincerely,

Eric Lawyer
Senior Legislative Advocate
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Jean Hurst
Legislative Representative
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jkh@hbeadvocacy.com

Johnnie Piña
Legislative Advocate
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CC: The Honorable Pilar Schiavo, Member, California State Assembly
Members and Consultants, Assembly Committee on Privacy and Consumer Protection
Josh Tosney, Chief Consultant, Assembly Committee on Privacy and Consumer Protection
Liz Enea, Policy Consultant, Assembly Republican Caucus

April 10, 2026

The Honorable Pilar Schiavo
California State Assembly
1021 O Street, Room 4140
Sacramento, CA 95814

Re: **Assembly Bill 2545 (Schiavo). Report: labor force impact: artificial intelligence.**
Support if Amended

Dear Assemblymember Schiavo,

On behalf of the California State Association of Counties (CSAC) and Urban Counties of California (UCC), the League of California Cities (Cal Cities), we write to express our "support if amended" position to your Assembly Bill 2545, related to the impact of artificial intelligence (AI) on California's workforce. We appreciate your leadership in this area and efforts to fully understand critical information about how the introduction of AI systems impacts individual workers and labor markets broadly, along with workforce replacement and the existing and missing data collection on impacts. However, we respectfully request that local agency employers be added to the proposed advisory panel to ensure the recommendations to the Legislature reflect a more complete assessment of how AI is used in the workplace.

AB 2545 would establish the California Artificial Intelligence Worker Impact Data Assessment Project Advisory Panel to be composed of representatives from academia, AI program developers, various non-profits, and public and private labor organizations. In light of the intended goals of AB 2545 to determine accurate, comprehensive data to protect workers and support strong workforce pathways through a proactive, evidence-based approach, leaving out local public agency employers would present a major gap in any finding. Since millions of employees serve in positions with the more than 6,000 agencies representing cities, counties, special districts and schools, the voice of local public agency employers should be included.

Thank you for your consideration of our requested amendments. We look forward to working with you to advance this measure with an advisory body reflecting a more complete representation of voices in California's workforce stakeholders.

Sincerely,

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

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

Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

April 10, 2026

The Honorable Dr. Akilah Weber Pierson
Chair, Senate Health Committee
1021 O Street, Suite 3310
Sacramento, CA 95814

RE: Senate Bill 989 (Blakespear) – Community Assistance, Recovery and Empowerment Act (CARE) Court – OPPOSE UNLESS AMENDED

Dear Chair Weber Pierson,

On behalf of the County Behavioral Health Directors Association (CBHDA), the California State Association of Counties (CSAC), the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), **we write to share our respectful opposition to Senate Bill 989, unless amended.** This bill proposes a new pathway for CARE court process initiations that overlaps with existing statute which authorizes first responders to file petitions to commence the CARE process. We have significant concerns that this bill would impact counties by requiring petitions for cases that which may not be appropriate.

Current law within Welfare and Institutions Code 5974 (f) already enables first responders, including peace officers, firefighters, paramedics, and others, to file a petition to commence the CARE process. In addition, behavioral health professionals are also listed within WIC 5974 as authorized individuals to file the petition to commence the CARE process. SB 989 authorizes first responders to require county behavioral health agencies to investigate a new case, complete a clinical assessment, determine appropriateness, and subsequently file a CARE petition within 30 days of a first responders' request. This is redundant practice and places an undue burden on counties who are already conducting this work with their respective CARE teams. Many individuals subject to the outreach and engagement called for in this process are typically unwilling to engage and resistant to services at first, and it sometimes takes many weeks to connect with them. Counties are concerned that the timelines proposed by this bill, along with the burdensome reinvestigation and appeals processes, is a massive shift in our current approach, one that would create an unnecessary increase in paperwork and court appearances and present significantly unreasonable time crunches for teams that are already stretched thin for resources.

With our existing authority to file petitions, certain counties have designated outreach and engagement teams that receive referrals from first responders and mobile crisis teams within their counties. When a referral comes in, our teams review the information, conduct a targeted outreach to complete our clinical assessment and decide whether filing a CARE petition makes sense based on statutory requirements. In our experience, this is not occurring at a high enough volume to warrant the requirement for counties to take on additional responsibilities that are otherwise conducted by first responders already in accordance with their existing authority to file petitions pursuant to WIC 5974. Particularly, in Santa Clara County, only 9 percent of CARE referrals were from first responders, and the other majority were from county mobile crisis response teams. ***We may suggest the following amendments to the Author to allow first responders to make a referral and allow county behavioral health to decide if an assessment is appropriate for the individual.***

> ***5974.5.*** *(a) In lieu of directly filing a petition to commence the CARE process, a first responder, as identified in subdivision (f) of Section 5974, may contact the county behavioral health agency of the county in which the respondent resides, if they believe that the respondent meets or is likely to meet criteria to qualify for the CARE process, as described in Section 5972, and request the county behavioral health agency file a petition to commence the CARE process.*
>
> *(b) The request pursuant to this subdivision shall include contact information for the respondent, including a telephone number and address, if available, and other information as specified by the department.*
>
> *(c) Within 30 business days of the request, the county behavioral health agency shall complete a review of the request and shall determine whether to file a petition in accordance with the provisions of this chapter.*
>
> *(d) In accordance with subdivision (b) of Section 5984, the department shall develop a request form to be used by the first responder and shall issue guidance to first responders regarding the procedure to request that a county behavioral health agency file a petition to commence the CARE process for the respondent.*
>
> *(e) The department shall include data regarding requests made pursuant to this section as part of the annual CARE Act report required by Section 5985.*

Through the Medi-Cal Community-Based Mobile Crisis Intervention Services benefit, county mobile crisis teams have successfully diverted individuals experiencing behavioral health crises from emergency departments, reduced law enforcement involvement, and have connected individuals to case-appropriate behavioral health services. Mobile crisis teams are essential to local responses to address homelessness, substance use conditions, and those experiencing serious mental illness (SMI), with 44% of adults utilizing a mobile crisis team being connected to mental health services within 30 days of these services[1]. We believe that further emphasis on utilizing mobile crisis services is an adequate approach to the problem intended to be solved by SB 989.

---

[1] Kim, S. Kim, H. Determinants of the use of community-based mental health services after mobile crisis team services: An empirical approach using the Cox proportional hazard model. J Community Psychol. 2017;45:877–887: https://doi.org/10.1002/jcop.21899

Counties are analyzing the impacts of all proposed legislation in the context of the implementation of H.R. 1. Counties estimate that this federal law will result in up to $9.5 billion in new annual costs to counties once fully implemented as it fundamentally shifts certain fiscal responsibilities for safety net programs to counties. This will significantly strain county budgets, impacting not just health and human services programs, but all essential services that counties provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new county costs or that places additional workload pressures on counties.

For these reasons above, **we are opposed to SB 989, unless amended.** For questions, please feel free to contact our respective organizations below.

Sincerely,

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Brendan McCarthy
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Sarah Dukett
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CC: Honorable Senator Catherine Blakespear
Honorable Members of the Senate Health Committee
Reyes Diaz, Principal Consultant, Senate Health Committee

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

April 9, 2026

The Honorable Caroline Menjivar
Chair, Senate Budget & Fiscal Review Subcommittee No. 3
1021 O Street, Suite 6630
Sacramento, CA 95814

RE: Request for Funding for Public Health Information Technology Systems

Dear Senator Menjivar,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write to respectfully request $97.6 million in 2026-27 to fund key public health information technology systems utilized in communicable disease prevention, immunizations, and disease investigation efforts.

While the Governor's January budget proposes $24.5 million General Fund in 2026-27 for the Surveillance and Public Health Information Reporting and Exchange (SaPHIRE) system, which we support, the Governor's January budget does not include funding for four other, critical systems. These systems include:

- **myCAvax** – Counties request $39 million for the California Vaccine Management System (myCAvax), which is the statewide platform used to order, manage, and distribute vaccines across all state vaccine programs.
- **CalCONNECT** – Counties request $26 million for the California Confidential Network for Contact Tracing (CalCONNECT) system, which supports case investigation and contract tracing for reportable infectious diseases.
- **CAIR** – Counties request $22 million for the California Immunization Registry (CAIR), which is the statewide immunization information system used to capture and share vaccination records for Californians.
- **FDSS** – Counties request $10.6 million for the Future Disease Surveillance System (FDSS), which is the planned cloud-based replacement to the California Reportable Diseases Information Exchange (CalREDIE).

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Without funding for these systems in the state's 2026-27 budget, each of these systems is slated to end operations as of June 30, 2026. In absence of support of these systems, counties are concerned about negative impacts to program efficiency and effectiveness, and the significant workload impacts for local health departments statewide.

Sustaining California's public health IT infrastructure is essential to maintaining effective disease prevention, vaccine delivery, and data exchange across the state's health care and public health systems. For these reasons, CSAC respectfully urges the Legislature to provide $97.6 million in 2026-27 to ensure these critical systems remain operational and continue serving California's residents. Should you have any questions, please do not hesitate to contact me at bmccarthy@counties.org.

Sincerely,

Brendan McCarthy
Senior Legislative Advocate

CC: Honorable Members, Senate Budget & Fiscal Review Subcommittee No. 3
Elisa Wynne, Staff Director, Senate Budget & Fiscal Review Committee
Scott Ogus, Deputy Staff Director, Senate Budget & Fiscal Review Committee
Kirk Feely, Fiscal Director, Senate Republican Caucus
Anthony Archie, Consultant, Senate Republican Caucus

April 9, 2026

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

RE: AB 2002 Local government assistance: Regional Early Action Planning Fund. As Introduced February 17, 2026 – Notice of Support

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, the League of California Cities (CalCities), the Urban Counties of California (UCC), the American Planning Association, California Chapter (APA), and the Rural County Representatives of California (RCRC) we write to express our support for AB 2002 (Solache), which codifies the Regional Early Action Planning (REAP 1.0) program, providing a critically needed framework to support state, regional, and local housing planning responsibilities.

California's cities and counties continue to face a severe and long-standing housing shortage. Meeting the state's housing needs requires robust, data-driven planning, strong intergovernmental coordination, and reliable tools that help local jurisdictions produce and preserve housing at all income levels. AB 2002 directly supports this goal by codifying a proven program that has already helped cities and regional governments modernize planning, enhance technical capacity, and increase housing readiness.

At the same time, the state's Regional Housing Needs Assessment (RHNA) requirements continue to grow in complexity and cost for cities, counties and regional planning agencies. These local governments must now analyze additional income categories, conduct interviews with households with special housing needs, meet expanded equity and environmental standards, and undergo enhanced review by the Department of Housing and

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Community Development (HCD). These responsibilities reflect important state priorities—but they cannot be met without stable, dedicated support.

AB 2002 provides exactly that. By codifying REAP 1.0 and establishing an ongoing framework to support regional governments and local jurisdictions, the bill strengthens the foundation of California's housing planning system. It will ensure that cities and counties can continue to access critical technical assistance, data tools, and capacity-building resources necessary to meet housing and zoning obligations. Moreover, AB 2002 reinforces the integrity of the RHNA process and advances the state's long-term housing goals.

For these reasons, CSAC, CalCities, UCC, APA, and RCRC are pleased to support your bill. If you have additional questions, please contact Mark Neuburger with CSAC at mneuburger@counties.org, Brady Guertin with CalCities at bguertin@calcities.org, Tracy Rhine with RCRC at trhine@rcrcnet.org, Reuben Duarte at policy@apacalifornia.org, or Chris Lee with UCC at clee@politicogroup.com.

Thank you for your consideration.

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties

Brady Guertin
Legislative Advocate
League of California Cities

Christopher Lee
Legislative Advocate
Urban Counties of California

Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California

Reuben Duarte
Vice President Policy and Legislation
APA California

CC: Members and Consultants, Assembly Appropriations Committee
The Honorable José Luis Solache, California State Assembly

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April 3, 2026

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

RE: AB 1754 (Pacheco) State General obligation bonds: requirements.
As Introduced February 9, 2026 – Notice of OPPOSITION

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in opposition to AB 1754 (Pacheco).

This bill would require all state general obligation bonds approved after January 1, 2027, to include an extensive set of new performance metrics, data collection rules, and reporting requirements for each state agency administering bond funding.

We support the intent of the author to provide Californians with more data and transparency in the administration of public funds authorized by voters through bond measures. However, as currently written, this bill would have unintended consequences that would lead to barriers to the timely expenditure of these funds for the projects that voters have supported. This bill would have negative impacts on projects intended to address housing, education, climate change, and other areas of urgent need. The need for expeditious investment of bond funds is even more critical in the current environment, given the drastic reductions in federal funding and uncertainty regarding the viability of remaining federal funds.

This bill would create substantial new duties for staff within every agency that administers bond funding (which is dozens in a typical bond measure) to develop performance metrics across an array of different mandated activities in a bond measure, as well as requirements for how the data used to evaluate progress along these metrics shall be collected. The establishment of new metrics to satisfy the bill's requirements will be a complex process that will divert state personnel from the direct oversight of bond funds being awarded to projects and reduce the effectiveness of the programs that will be needed to work with project proponents who will deliver the results expected by voters. As there is no identified

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source of funding in the bill, any activities mandated by this bill will be an additional strain on already precarious agency budgets.

Further, any new data collection requirements will, by necessity, impact project proponents, who will need to provide information on a regular basis to state agencies in order to have meaningful information for the purposes of this bill. Any entity using bond funds to complete a project already faces existing reporting requirements to state agencies, and while this may be an extant feature of the public infrastructure landscape, the complex informational requirements imposed by this bill will represent a significant increase in this reporting burden for proponents. This will result in especially problematic impacts on those entities carrying out projects on behalf of disadvantaged communities. These communities already face challenges in planning and developing infrastructure projects and frequently require technical assistance from agencies and nonprofit organizations to even apply for bond funding in the same manner as more well-resourced communities. Disadvantaged communities will struggle to comply with the elevated data monitoring necessitated by this bill's provisions.

Finally, the lack of an Administrative Procedure Act (APA) exemption for activities mandated by this bill means that expenditure of bond funds will be delayed while agencies stand up new monitoring and reporting requirements. The Legislature is currently grappling with this issue in the form of Proposition 4 (2024), which did not include an APA exemption for the necessary funding guidelines and criteria that agencies must develop, and is now experiencing delays in awarding the $10 billion authorized by voters to respond to the ongoing climate change crisis. In some cases, this unintended administrative hurdle will delay projects by years. The policy crises that California is experiencing will not wait for years while agencies complete lengthy review processes. Every delay increases costs for projects that are already subject to intense pressure from inflation and market instability. The Legislature has passed AB 107 (Gabriel) already this year, and is considering AB 35 (Alvarez) as well to address the delays affecting Proposition 4; it should not compound this problem by expanding it to every new bond measure in the future.

For these reasons, we are opposing AB 1754 (Pacheco). If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

March 31, 2026

The Honorable Isaac Bryan
Chair, Assembly Committee on Natural Resources
1020 N Street, Room 164
Sacramento, CA 95814

RE: AB 1812 (Aguiar-Curry) Solid waste: compostable products
As amended on March 23, 2026 – SUPPORT
To be heard in Assembly Natural Resources Committee on April 6, 2026

Dear Chair Bryan,

The California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and League of California Cities (Cal Cities) are pleased to **support** Assembly Bill 1812 related to compostable products.

Local governments have been working in good faith to implement the sweeping requirements of SB 1383 (Chapter 395, Statutes of 2016) which mandates the collection and processing of organic waste at an unprecedented scale. Cities and counties have invested substantial public resources to establish new or expand existing collection programs, amend contracts, secure responsible end markets, educate residents and businesses, and conduct enforcement.

California's organics recycling system processes approximately 12 million tons of yard trimmings and food scraps annually, but this system depends on uncontaminated organic waste streams. These efforts are undermined when non-compostable materials enter the system. Plastic and "compostable plastic" contamination in the compost stream increases processing costs, degrades compost quality, leads to rejected loads and landfilling, and jeopardizes the ability to meet procurement requirements, threatening the viability of organic waste recycling programs and the markets that depend on high-quality finished compost. Removing contamination from composting streams already accounts for over 20% of compost production costs. Therefore, addressing problematic plastics and misleading "compostable" claims is essential to ensure that SB 1383 implementation remains feasible, cost-effective, and capable of delivering the environmental benefits the Legislature intended.

Previously, the State and local jurisdictions had little control over the design and labeling of "compostable plastics" products entering the stream of commerce that ultimately contaminate the organic waste systems they have invested heavily to develop. AB 1201 (Chapter 504, Statutes of 2021) sought to remedy this issue by setting standards for products to be able to be considered compostable. Under AB 1201, products labeled as "compostable" must meet multiple criteria: they must comply with USDA National Organic Program (NOP) standards for allowable compost feedstocks, pass recognized ASTM compostability tests, and be free of persistent contaminants such as PFAS, ensuring that certified compostable products are truly compatible with organic recycling systems and safe for end markets.

In August 2023, the Biodegradable Products Institute (BPI), a North American trade organization representing manufacturers of compostable products, petitioned NOP to allow certified "compostable plastics" in organic production. While this petition was under consideration, CalRecycle extended the implementation deadline for AB 1201 requirements from January 1, 2026 to June 30, 2027. In January 2026, the USDA National Organic Standards Board (NOSB) unanimously voted against adding broad classes of synthetic compostable materials to the National List of allowed compost feedstocks under the NOP. While the NOSB concluded that those products do not currently meet the criteria for organic labeling, it kept open the possibility for future review of individual substances on a case-by-case basis. As a result, compost that contains plastics of any kind, including "compostable" bioplastics, are not eligible to be labeled organic. Farmers purchase two-thirds of the compost produced in California and rely on NOP certification to guarantee quality and purity. Organic farmers rely on NOP certification to protect their status as Certified Organic growers.

Beyond the NOP requirements, compostable plastics generally do not fully decompose in California's composting facilities. While some bioplastics may meet ASTM standards, those ASTM standards do not reflect real world composting conditions and timeframes in California's facilities. Even if compostable plastics were able to fully decompose in California's compost facilities, the federal bar on labeling the end product as organic would eliminate much of the market for finished compost, thereby leaving public and private facilities awash in unwanted compost.

AB 1812 would preserve California's robust and renowned composting system from plastic pollution by keeping plastic contamination out of the organics recycling system and aligning consumer expectations with the realities of California's composting systems. The

bill makes clear that manufacturers should make all plastic items recyclable and focus on the use of plant fiber for compostable products.

AB 1812 is needed to align upstream product standards with downstream composting realities. By reducing problematic materials at the source and clarifying what can truly be composted in real-world facilities, the bill will help protect existing infrastructure investments, preserve agricultural and landscaping end markets, and ensure that compost produced from California's organic waste programs remains safe, usable, and marketable. Without these safeguards, contamination will continue to erode program effectiveness and place additional financial burdens on local ratepayers while jeopardizing the State's circular economy goals.

For these reasons, we are pleased to **support** AB 1812. If you have any questions, please contact Jordan Wells (CSAC) at jwells@counties.org, John Kennedy (RCRC) at jkennedy@rcrcnet.org, or Melissa Sparks-Kranz (Cal Cities) at msparkskranz@calcities.org.

Respectfully,

Jordan Wells
Legislative Advocate
California State
Association Of Counties

John Kennedy
Senior Policy Advocate
Rural County Representatives
of California

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

March 31, 2026

The Honorable Isaac Bryan
Chair, Assembly Committee on Natural Resources
1020 N Street, Room 164
Sacramento, CA 95814

RE: AB 2635 (C. Rodriguez) Air pollution: small off-road engines: rebate programs: local regulation
As introduced on February 20, 2026 – CONCERNS
To be heard in Assembly Natural Resources Committee on April 6, 2026

Dear Chair Bryan,

On behalf of the California State Association of Counties (CSAC) and League of California Cities (CalCities), we write with **Concerns** on Assembly Bill 2635 related to local regulation for small off-road engines.

Small off-road engines (SORE) are spark-ignition engines that are often used in lawn and garden equipment, as well as other outdoor power equipment and specialty vehicles. AB 1346 (Chapter 753, Statutes of 2021) phased out the sale of new gas-powered SORE, and the 2021-2022 budget appropriated $30 million to assist small businesses make the transition to battery-powered alternatives. AB 1346 also tasked the California Air Resources Board (CARB) to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines.

AB 2635 would preempt local decision making by preventing local governments from adopting ordinances that prohibit the use of SORE landscaping equipment, or enforcing such ordinances adopted in 2022 or later, until 2032. Such ordinances are consistent with state law, AB 1346, which was codified in 2022.

CSAC and Cal Cities support the state's clean energy goals to become carbon neutral by 2045. To achieve such targets, efforts across multiple regulatory programs will need to continue to be advanced in the coming decade. AB 2635 takes a step backward, by proposing to pause the goals set forth in AB 1346 and CARB's regulations and simultaneously preempting numerous cities and counties that have proactively passed

ordinances to prohibit the use of SORE consistent with state law. As the state advances with its clean energy goals, it is important to recognize and preserve the ability of local governments to respond to the unique needs, conditions, and priorities of their communities. A more balanced approach to AB 2635 must be taken to ensure statewide progress while respecting the need to act at the local level.

For these reasons, we have concerns regarding AB 2635 as currently written but remain committed to working collaboratively to strike the right balance of continuing to promote the state's clean energy goals while preserving the ability for local governments to take action locally. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org or Melissa Sparks-Kranz (CalCities) at msparkskranz@calcities.org.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

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

April 3, 2026

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

RE: SB 1001 (Archuleta) Local agency, corporation, or mutual water company: personnel access: Personal Identity Verification-Interoperable.
As amended on March 17, 2026 –Notice of SUPPORT

Dear Chair Arreguín,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of SB 1001 (Archuleta).

This bill would require the California Governor's Office of Emergency Services (CalOES) to develop identity verification cards for local water utility workers, in order to allow them to access areas affected by floods, storms, fires, earthquakes, or other disasters and restore affected water infrastructure. The bill would establish authorities and guidance for law enforcement officers to allow water utility workers carrying these identification cards to access disaster-stricken areas and perform their duties.

Proper disaster response must include restoring essential services to affected residents as soon as possible. As counties, we are among the many local government entities that ensure the continuity and restoration of water service to our constituents, without which homes become uninhabitable and response services delayed and obstructed. This measure assists our water utility workers in carrying out their duties and restoring service as quickly as possible in emergency situations by making them easily identifiable to law enforcement. The recent Palisades and Eaton wildfires, only the latest in a series of catastrophic disaster events, have demonstrated the need to ensure that response efforts are as coordinated as possible. This bill would be a valuable step forward in those efforts.

For these reasons, we are pleased to support SB 1001. If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

CSAC Officers

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

March 30, 2026

The Honorable Josh Becker
Chair, Senate Natural Resources & Water Committee
1021 O Street, Suite 3220
Sacramento, CA 95814

RE: Senate Bill 1404 (Stern) — OPPOSE
As Amended March 25, 2026

Dear Senator Becker,

On behalf of the California State Association of Counties (CSAC) and the Rural County Representatives of California (RCRC), we regretfully oppose Senate Bill 1404, authored by Senator Henry Stern. This measure would reinstate the State Responsibility Area (SRA) fee, which was suspended and backfilled in 2017 in exchange for reauthorization of the state Cap-and-Trade program, now known as Cap-and-Invest. Together, CSAC and RCRC represent all 58 California counties, many of which would be acutely impacted by the reactivation of the SRA fee.

The SRA fee was discontinued in 2017 by the California Legislature on the condition of continuing the Cap-and-Trade program, now known as Cap-and-Invest. The agreement is reflected in Assembly Bill 398 (Chapter 135, Statutes of 2017), which repealed the fee through 2031. By reinstituting the SRA fee, the Legislature is reneging on its promise to relieve residents living in the wildland urban interface of a burdensome and unfair fee so that CAL FIRE can remain fully funded in a tough budget landscape. Forest resilience and wildfire mitigation has already been deprioritized in the reauthorized version of the program in order to fund other projects. Our organizations believe it is inappropriate to violate the 2017 agreement in order to backfill these reprioritized funds.

Approximately 4 million Californians live in the Wildland Urban Interface (WUI), many of which are socioeconomically disadvantaged. A large percentage of rural residents in the WUI consists of elderly residents on fixed incomes. Residents in the SRA are already grappling with the affordability issues surrounding property insurance. Similarly, the state is asking residents across California to invest in wildfire retrofits that cost $40,000-60,000 per home in order to secure insurance that may not even be affordable. Many of these Californians already cannot afford the costs associated with living in the WUI.

Furthermore, implementation of the original SRA fee was logistically and administratively confusing for both the administrators and fee payors. Homeowners that did not even live in the SRA were routinely charged fees, while upfront costs to launch the program approached $15 million—nearly 19 percent of the total revenue of the program. The time, staffing, and effort to relaunch the fee could very well outpace the overall benefits of collecting the funds, just as it did in 2012.

Finally, many rural county residents already pay for local fire services, even if they have no CAL FIRE presence in their areas at all. The proposed SRA fees will result in double or triple taxation with no added benefit for many rural Californians and hurt local fire departments by making the already-difficult task of raising local revenues to support local firefighting efforts nearly impossible. In turn, this could very well impact urban areas by weakening the state's mutual aid system that allows it to respond to any type of major disaster.

The SRA fee was costly and harmful to California residents living in the WUI. Now, with the question of affordability looming large in the minds and bank accounts of Californians, it is imprudent to consider making life in California even more expensive for some of our most economically disadvantaged residents by levying this fee at this time. Our organizations are eager to engage the Legislature on a more judicious course to funding the state's wildfire mitigation activities.

For the above reasons, we remain opposed to the imposition of the SRA fee and must regretfully oppose SB 1404 and urge your "no" vote when it comes before your committee. Please do not hesitate to contact us with any questions.

Sincerely,

STACI HEATON
Senior Policy Advocate
Rural County Representatives of California
sheaton@rcrcnet.org

JORDAN WELLS
Legislative Advocate
California State Association of Counties
jwells@counties.org

cc: The Honorable Henry Stern, California State Senate
Members of the Senate Natural Resources and Water Committee
Katharine Moore, Principal Consultant, Senate Natural Resources and Water Committee

April 2, 2026

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

Re: **Assembly Bill 1961 (Ahrens). Civil actions: protective orders: workplace violence – SUPPORT**
To be heard in Assembly Committee on Labor and Employment on April 8, 2026

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (Cal Cities), and California Association of Joint Powers Authorities (CAJPA), we write in support of Assembly Bill 1961 (Ahrens), related to workplace violence restraining orders. This measure seeks to provide employers with additional tools to address threats targeting employees through existing mechanisms and closes a gap in current law.

Under current law, employers may seek workplace violence restraining orders on behalf of employees who face harassment, unlawful violence, or credible threats of violence, so long as the threat is reasonably connected to the workplace. However, this requires the naming of a specific individual or individuals who have been threatened. This approach works effectively when the circumstances match the requirements set forth in filing process. However, public agencies are often subject to threats aimed at groups or a worksite location and not a named individual.

Public agencies have seen an unfortunate rise in hostility and threats form the public. In recent years, county registrars have faced bomb threat[1] and mailing of substances that are either harmful or designed to appear harmful[2]. These incidents have a real impact on employees' sense of safety and security even when an individual is not named.

AB 1961 addresses this problem by changing the definition of "employee" in the Civil Code of Procedure to encompass specific groups of workers based on their worksite locations. This change aims to reflect the real circumstances of the threats' intended audience or target.

We are committed to providing safe working conditions and secure worksites. AB 1961 furthers that commitment by providing an additional, meaningful mitigation step to stem future threats, escalation of threats, or even potential acts against employees. On behalf of the undersigned organizations, we respectfully request your AYE vote.

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
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Faith Borges
Legislative Advocate
California Association of Joint Powers Authorities
fborges@publicpolicypartnership.com

[1] LA County election office receives latest in series of bomb threats (ABC News 7 | November 9, 2024)
[2] Presumptively Dangerous Substance Found in California County Elections Office (Secretary of State | January 17, 2024)

Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

CC: The Honorable Patrick Ahrens, Member, California State Assembly
Members and Consultants, Assembly Committee on Labor and Employment
Megan Lane, Chief Consultant, Assembly Committee on Labor and Employment
Rose Rastbaf, Policy Consultant, Assembly Republican Caucus

April 2, 2026

The Honorable Patrick Ahrens
California State Assembly
1021 O Street, Room 6110
Sacramento, CA 95814

Re: **Assembly Bill 1961 (Ahrens). Civil actions: protective orders: workplace violence – SUPPORT**
To be heard in Assembly Committee on Labor and Employment on April 8, 2026

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (Cal Cities), and California Association of Joint Powers Authorities (CAJPA), we write in support of your Assembly Bill 1961, related to workplace violence restraining orders. This measure seeks to provide employers with additional tools to address threats targeting employees through existing mechanisms and closes a gap in current law.

Under current law, employers may seek workplace violence restraining orders on behalf of employees who face harassment, unlawful violence, or credible threats of violence, so long as the threat is reasonably connected to the workplace. However, this requires the naming of a specific individual or individuals who have been threatened. This approach works effectively when the circumstances match the requirements set forth in filing process. However, public agencies are often subject to threats aimed at groups or a worksite location and not a named individual.

Public agencies have seen an unfortunate rise in hostility and threats form the public. In recent years, county registrars have faced bomb threat[1]and mailing of substances that are either harmful or designed to appear harmful[2]. These incidents have a real impact on employees' sense of safety and security even when an individual is not named.

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We are committed to providing safe working conditions and secure worksites. AB 1961 furthers that commitment by providing an additional, meaningful mitigation step to stem future threats, escalation of threats, or even potential acts against employees.

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
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Faith Borges
Legislative Advocate
California Association of Joint Powers Authorities
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[1] LA County election office receives latest in series of bomb threats (ABC News 7 | November 9, 2024)
[2] Presumptively Dangerous Substance Found in California County Elections Office (Secretary of State | January 17, 2024)

Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

April 1, 2026

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

Re: **AB 2027 (Ward): Worker data: prohibitions: artificial intelligence.**
As amended March 16, 2026 – OPPOSE
To be heard in Assembly Committee on Labor and Employment on April 8, 2026

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), Association of California Healthcare Districts (ACHD), and League of California Cities (Cal Cities) we write in respectful opposition to AB 2027 (Ward), which would cause an effective ban on the use of an artificial intelligence (AI) tool by a public agency.

We understand the reasonable concerns about the slow creep of new technologies into daily life. However, the scope of this bill is vast and could effectively ban any tool that is developed with the input of workers. Local agency employers are incorporating AI and automated decision system (ADS) technology to improve service delivery, address risks, and empower employees to focus on more meaningful work through streamlining some rote aspects of job duties. State law has protected the right of public employees to bargain, and public employees have a property interest in their position that is protected by due process[1]. Public agencies and their workforce have long bargained over the conditions of their workplace and, more frequently, we have seen MOUs include agreements on the use of AI or ADS.

A complete ban on artificial intelligence tools for the uses specified in the bill, when trained with worker data that relates to or describes how a worker performs their

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

job duties, would be detrimental to the development of tools that assist public employers in streamlining and supporting essential services, such as benefits enrollment, resume screening, timekeeping and scheduling, and even systems to detect wildfires and monitor dam safety. AI systems rely on data inputs in order to train them to work effectively. It is hard to fathom how they could function effectively without the input of the public employees and officials with firsthand knowledge of and experience on how to deliver a service or manage risks. Collectively, the terms replication, automation, and replacement, coupled with the bill's defined terms, may extend this bill's application to vast swaths of AI technology uses, including for efficiency and safety, as well as innocuous uses and legacy automated technologies.

These new tools represent a new era of service delivery. As the public sector workforce adopts new technologies, we ask that legislation not hinder the use or potential use of innovations that are already proving to support critical public sector operations.

Additionally, we have concerns regarding the bill's provision that holds employers jointly and severally liable for a vendor's breach in data security or unauthorized system access. While it is appropriate for a vendor to implement and maintain reasonable security procedures to protect worker data, employers do not control the internal systems or security practices for third party vendors, and placing the burden of liability on a public agency for actions it does not have direct control over is misplaced.

Finally, AB 2027 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague and sweeping, and which will result in unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per worker for each violation. The County of Los Angeles employs over 100,000 workers. A single violation to the county would cost upwards of $50,000,000. The bill also subjects public agencies to civil actions, opening them up to liability for punitive damages and attorney's fees. The inclusion of independent contractors in the definition of "worker" blurs the roles of employer and workers, while increasing compliance complications as well as increasing litigation risk.

We are concerned AB 2027 could have vast unintended consequences that prohibit innovation and tools used to assist employees and ensure access to public benefits.

For these reasons, we are firmly **opposed** to AB 2027 and urge your "NO" vote.

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

Sarah Bridge
Vice President, Advocacy & Strategy
Association of California Healthcare Districts
sarah.bridge@achd.org

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

Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Assembly Committee on Labor and Employment
Erin Hickey, Principal Consultant, Assembly Committee on Labor and Employment
Rose Rastbaf, Policy Consultant, Assembly Republican Caucus

April 1, 2026

The Honorable Christopher Ward
California State Assembly
1021 O Street, Suite 6350
Sacramento, CA 95814

Re: **AB 2027 (Ward): Worker data: prohibitions: artificial intelligence.**
As amended March 16, 2026 – OPPOSE

Dear Assemblymember Ward,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), Association of California Healthcare Districts (ACHD), and League of California Cities (Cal Cities) we write in respectful opposition to your AB 2027, which would cause an effective ban on the use of an artificial intelligence (AI) tool by a public agency.

We understand the reasonable concerns about the slow creep of new technologies into daily life. However, the scope of this bill is vast and could effectively ban any tool that is developed with the input of workers. Local agency employers are incorporating AI and automated decision system (ADS) technology to improve service delivery, address risks, and empower employees to focus on more meaningful work through streamlining some rote aspects of job duties. State law has protected the right of public employees to bargain, and public employees have a property interest in their position that is protected by due process[1]. Public agencies and their workforce have long bargained over the conditions of their workplace and, more frequently, we have seen MOUs include agreements on the use of AI or ADS.

A complete ban on artificial intelligence tools for the uses specified in the bill, when trained with worker data that relates to or describes how a worker performs their job duties, would be detrimental to the development of tools that assist public employers in streamlining and supporting essential services, such as benefits

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

enrollment, resume screening, timekeeping and scheduling, and even systems to detect wildfires and monitor dam safety. AI systems rely on data inputs in order to train them to work effectively. It is hard to fathom how they could function effectively without the input of the public employees and officials with firsthand knowledge of and experience on how to deliver a service or manage risks. Collectively, the terms replication, automation, and replacement, coupled with the bill's defined terms, may extend this bill's application to vast swaths of AI technology uses, including for efficiency and safety, as well as innocuous uses and legacy automated technologies.

These new tools represent a new era of service delivery. As the public sector workforce adopts new technologies, we ask that legislation not hinder the use or potential use of innovations that are already proving to support critical public sector operations.

Additionally, we have concerns regarding the bill's provision that holds employers jointly and severally liable for a vendor's breach in data security or unauthorized system access. While it is appropriate for a vendor to implement and maintain reasonable security procedures to protect worker data, employers do not control the internal systems or security practices for third party vendors, and placing the burden of liability on a public agency for actions it does not have direct control over is misplaced.

Finally, AB 2027 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague and sweeping, and which will result in unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per worker for each violation. The County of Los Angeles employs over 100,000 workers. A single violation to the county would cost upwards of $50,000,000. The bill also subjects public agencies to civil actions, opening them up to liability for punitive damages and attorney's fees. The inclusion of independent contractors in the definition of "worker" blurs the roles of employer and workers, while increasing compliance complications as well as increasing litigation risk.

We are concerned AB 2027 could have vast unintended consequences that prohibit innovation and tools used to assist employees and ensure access to public benefits.

For these reasons, we must respectfully oppose your AB 2027.

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
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Sarah Bridge
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Aaron Avery
Director of State Legislative Affairs
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Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

April 1, 2026

The Honorable Mike Gipson
Chair, Assembly Revenue and Taxation Committee
1020 N Street, Room 167A
Sacramento, CA 95814

RE: **AB 2192 (Gonzalez) Sales and use taxes: farm equipment and machinery.**
Notice of OPPOSITION *(As Amended on March 18, 2026)*

Dear Chair Gipson,

The League of California Cities (Cal Cities) and the California State Association of Counties (CSAC) must respectfully **oppose** AB 2192 (Gonzalez), which would expand the existing state sales and use tax exemption for farm equipment and machinery to apply to local Bradley-Burns sales taxes and certain local transactions and use taxes. While we appreciate the author's intent to provide tax relief to the agricultural sector, this bill would result in ongoing reductions to local revenues that cities and counties rely on to fund essential public services.

In California, only 3.9375 percent of the base sales tax rate supports the state's General Fund; the remainder—over half—is dedicated to local governments and voter-approved programs, including:

- Local Bradley-Burns sales tax revenues that fund core city services such as police, fire, and emergency response;
- Local transportation programs; and
- Voter-approved local add-on taxes that support infrastructure, libraries, parks, and other community priorities.

Under current law, the tax exemption for farm equipment and machinery is excluded from local sales and use taxes, thereby protecting local revenue streams. AB 2192 would remove this safeguard, reducing local revenues that communities rely on for essential services.

Existing law requires the state to reimburse local agencies for revenue losses resulting from sales and use tax exemptions when the funds have been appropriated by the Legislature. While we appreciate that AB 2192 includes a $200 million General Fund appropriation to reimburse counties and cities, the bill only provides an explicit appropriation for the initial fiscal year. This creates significant uncertainty as to whether future reimbursements will be fully funded and sustained over time. Local governments rely on stable and predictable revenue streams to fund essential services, and any disruption or inconsistency in backfill funding can have real impacts on public safety, infrastructure maintenance, and community programs.

Additionally, the bill raises concerns regarding equity and fiscal sustainability. While certain agricultural operations may benefit from expanded tax exemptions, the resulting revenue losses would be borne by cities and counties statewide, including those that do not directly benefit from the agricultural activity. This creates a disconnect between those receiving the benefit and those absorbing the fiscal impact.

Local governments are already facing increasing fiscal pressures, including rising costs for public safety, infrastructure, and climate resilience. In addition, H.R. 1 will have significant fiscal impacts on counties and the communities they serve, with anticipated costs ranging from $6.0 billion to $9.5 billion annually once fully implemented. Reducing local sales tax revenues, one of the most flexible and critical funding sources available to cities and counties, will further strain their ability to deliver essential services to residents.

For these reasons, we respectfully **oppose** AB 2192 (Gonzalez). If you have any questions, please do not hesitate to contact us at btriffo@calcities.org, or ejungwirth@counties.org.

Sincerely,

Ben Triffo
League of California Cities
Legislative Advocate

Emma Jungwirth
California State Association of Counties
Senior Legislative Advocate

March 31, 2026

The Honorable Darshana Patel
Chair, Assembly Education Committee
1020 N Street, Room 159
Sacramento, CA 95814

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As introduced February 20, 2026 – SUPPORT
To be heard in Assembly Education on April 8, 2026

Dear Chair Patel:

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), League of California Cities (Cal Cities), and California Special Districts Association (CSDA), we are pleased to support Assembly Bill 2640 (Hadwick), which we believe provides sensible fiscal relief and the fiscal flexibility necessary for efficient, modern governance by local agencies. The state mandate reimbursement process, and administrative issues therein generally, have long burdened local governments and our organizations continue to support efforts to reform the current process.

Reimbursable State Mandate Process: Long and Uncertain
Every year, the Governor signs, on average, more than 1,000 bills and enacts new laws in the interest of governing California. Many new laws require local governments to implement new programs or provide new services. Laws that require local government entities to implement new programs or provide higher levels of service to the public are often referred to as "reimbursable state mandates," a term of art particular to California.

Local governments are required to comply with all laws that create new state-mandated programs and services. When those new initiatives do not come with an appropriation of funds to carry them out, local governments only receive funding to carry out many state-mandated programs through reimbursement payments from the state long after the fact, and only when a state body has adjudicated the matter through a convoluted claims process.

Reimbursement for local governments to comply with new state-mandated programs is not automatic. Local governments initiate the process to receive reimbursement approval via the Commission on State Mandates, which may take a year or more to determine whether the new law meets the constitutional criteria for reimbursement—and even longer to establish a process and rate for reimbursement. Therefore, local governments comply with new costly laws pending reimbursement status, often funding these programs alone for years, facing the uncertainty of reimbursement. Local governments comply with all other state mandates using local revenues.

Backlog of Unreimbursed State-Mandated Costs Owed to Local Governments

Over the years, the state has accrued a significant backlog of funds owed to local governments for work performed to carry out state-mandated projects. According to the State Controller's Office[1], as of October 2025 the state owes local governments collectively $910.9 million, including estimated accrued interest. This nearly $1 billion figure includes funds owed for claims for active state-mandated programs, unpaid claims from prior fiscal years, and outstanding "incorrect reduction" claims filed with the Commission on State Mandates.

How This Measure Helps

Even after a reimbursement is issued, an audit or review by the State Controller's Office may reduce the reimbursement amount paid by disallowing previously approved payments years after the fact. When the State Controller's Office disallows costs previously claimed by counties, the affected county may choose to either remit the disallowed amount to the state, or the State Controller's Office offsets (withholds) commensurate amounts from state-mandated costs reimbursements filed by that county in subsequent fiscal years. Either way, the local government then must pay that disallowed amount back to the state. These repayments must occur even if the state has other outstanding debts owed to that local government. For some local governments, especially communities with constrained budgets, repaying even a portion of their reimbursement claims causes fiscal strain.

This measure will authorize the Controller to allow a local government to offset any reduced reimbursement from other unpaid reimbursement claims occurring on or after January 1, 2027. This change would provide local governments with financial relief instead of allowing the state to claw back funds while still owing debts to that same local government. This mechanism supports cash-strapped local governments and retains critical funding for under-resourced communities.

Local governments continue to support efforts to modernize the state mandate claiming and reimbursement process. AB 2640 represents a modest, but important, step towards these reform efforts and provides needed fiscal flexibility for local agencies. For these reasons, we

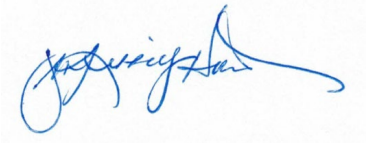
[1] State Controller's Office AB 3000 State-Mandated Program Cost Report of Payments and Appropriations (October 31, 2025)

are pleased to support AB 2640. 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
ejungwirth@counties.org

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



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

Ben Triffo
Legislative Affairs, Lobbyist
League of California Cities
btriffo@calcities.org

Marcus Detwiler
Legislative Representative
California Special Districts Association
marcusd@csda.net

CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Assembly Education Committee
Tanya Lieberman, Chief Consultant, Assembly Education Committee
Bob Becker, Consultant, Assembly Republican Caucus

April 1, 2026

The Honorable Cottie Petrie-Norris
California State Assembly
1021 O Street, Suite 8120
Sacramento, CA 95814

Re: AB 2656 (Petrie-Norris): Public Employees: notice: artificial intelligence performing service within the scope of work
As amended 3/19/26 – OPPOSE
Set for hearing 4/08/26 – Assembly Public Employment and Retirement Committee

Dear Assembly Member Petrie-Norris:

On behalf of the Urban Counties of California (UCC), the California Special Districts Association, the Rural County Representatives of California, and the California State Association of Counties, we write in respectful opposition to your Assembly Bill 2656, a measure that will require local agencies to provide a recognized employee organization no less than 45 days' written notice before taking an action to develop, purchase, implement, or utilize any generative artificial intelligence to perform a service that is within the scope of work of the job classification represented by the recognized employee organization. While this brief measure appears simple on its face, these notification requirements will burden local agency employers, preclude efficiencies, impact service delivery, and undermine productive labor relations with little benefit.

Like much of the public sector, local agencies are cautiously testing the use of artificial intelligence tools in day-to-day operations. Tools that promise to streamline routine activities (like the note-taking tools included in virtual meeting software such as Zoom and Teams) allow our employees to focus their time and attention on the most important components of serving the public. Often, these tools are relatively benign, like ChatGPT and Microsoft Copilot, and such tools are frequently included in off-the-shelf software ubiquitous in the modern office environment. When tools become available that assist with specific aspects of public service (like charting in a health clinic or monitoring drinking water safety), they are often vetted in partnership with employees with the mutual goals of ensuring staff is empowered to focus on certain aspects of their work and providing more efficient and effective outcomes that benefit the public.

Importantly, local agencies remain subject to the statutory provisions Meyers-Milias-Brown Act (MMBA), which require local agencies to meet and confer with recognized employee organizations regarding changes to employees' wages, hours, or terms and conditions of employment. Existing law provides a robust framework for determining when particular uses of generative artificial intelligence may actually have a significant and adverse effect on the employment relationship, in

which case notification (and more) is already required. This bill is therefore both overbroad and unnecessary.

Finally, local agencies are subject to last year's AB 339 (Chapter 687, Statutes of 2025), which requires additional notice to recognized employee organizations regarding a range of local agency contracting activities, even when those activities do not rise to the level of triggering meet-and-confer obligations under the MMBA's usual standards. This additional notification requirement has been incredibly burdensome for local agencies and has required a significant amount of time, legal resources, and training to implement. The further unworkable notification provisions in this bill would exacerbate these concerns and represent another state mandate for which the state may be obligated to provide reimbursement under Article XIII B of the California Constitution.

It is also important to note the myriad other legislative measures that seek to limit the use of artificial intelligence in the public sector in multiple forms. Regardless of the benefit of any new technologies and regardless of any obligation to take such action in a public meeting, local agencies would be seriously hindered in adopting such tools under these proposals. To be sure, if some of those measures are approved by the Legislature, there will be no notification necessary as many of them would effectively impose bans on the use of most AI tools.

AB 2656 appears to be a solution without a clearly identified problem. As a result, we must oppose the bill. Should you have any questions about our position, please reach out to us directly.

Sincerely,

Jean Kinney Hurst
Legislative Representative
Urban Counties of California

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Sarah Dukett
Policy Advocate
Rural County Representatives of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

cc: The Honorable Tina McKinnor, Chair, Assembly Public Employment and Retirement Committee
Members and Consultants, Assembly Public Employment and Retirement Committee

March 27, 2026

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

Re: Senate Bill 951 (Reyes). Employment: technological displacement: notice.
Oppose Unless Amended (*as amended March 26, 2026*)

Dear Senator Smallwood-Cuevas,

On behalf of the undersigned statewide organizations representing local educational and local government agencies we write to express our "oppose unless amended" position to Senate Bill 951 (Reyes), related to workforce displacement or termination due to the adoption of certain technologies. Regrettably, this conflicts with well-established layoff notice and rehire statutory requirements in the education sector, as well as technology bargaining between other local government employers and employees. As such, we request that the bill be amended to exempt local educational agency (LEA) employers and local government employers from the bill's new requirements.

In summary, SB 951 would establish the California Worker Technological Displacement Act, and require employers to provide at least a 90-day advanced written notice before any reduction in hours or termination caused wholly or primarily due to the use of artificial intelligence or other automated technology (undefined). For employers of 100 or more, it establishes return rights for terminated employees and prohibition of termination during the 90-day notice period. Compliance failure causes an employer to be liable for backpay and any medical expenses incurred by the worker that would have been covered by an employer-sponsored health plan. The bill would also subject public agencies to a $500 fine for each day of a violation and allows any interested party to file a report of compliance failure with the Labor Commissioner. It should be noted that independent contractors are included in the definition of "worker" so under SB 951, cities, counties, school districts and special districts would have to provide employees of a private company backpay and other benefits if proper notice is not given.

(continued)

Regrettably, SB 951 creates processes that are likely better suited for private labor practices and does not fit schools serving TK- 12 grade levels or local government employers. First, for school employers, SB 951 would create a bifurcated system of layoff notice procedures outside the well-established March 15 layoff notice process that applies to both certificated and classified positions.

Further, the rehire procedures in SB 951 could bump other school employees from their return-to-work rehiring rights by undermining both existing collectively bargained agreements and statewide practices conforming with California Education Code statutes. Under existing law, LEAs have established rehire policies that provide 39 months of return rights to the same classification, without losing seniority, for individuals who have been laid off (due to budget constraints or reduced levels in service needs) or have exhausted their medical leave. This practice includes job opportunities notifications for positions they are qualified for, or may be qualified[1] for, and the opportunities are offered based on seniority. Seniority is also used to determine job offers when there is more than one qualified candidate. Job notifications are provided to individuals on the rehire list based on the format determined by a collectively bargained agreement.

In addition, for public employers with represented workforces, including cities, counties, special districts, and school districts, the 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 to deter or discourage union membership. Specifically, Government Code Section 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 Section 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.

In closing, SB 951 mandates costly administrative procedures for implementing and tracking in addition to liability exposure for complaints brought by any member of the public for possible violations. Further, this measure unfortunately interrupts practices already in place for public school employees who are laid off for reasons outside of job performance or disciplinary proceedings, and their rights to return to work.

For these reasons, we respectfully request that paragraphs (2) and (3) of subdivision (b) are removed from the definition of “employer” in Section 1414.1 of the bill. Please do not

[1] *Tucker v. Grossmont Union High School District (2008)*

(continued)

hesitate to contact Dorothy Johnson, Association of California School Administrators Legislative Advocate, if you have any questions regarding our position at (916) 329-3807.

Sincerely,

Dorothy Johnson
Legislative Advocate
Association of California School Administrators

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Sarah Dukett
Policy Advocate
Rural County Representatives of California

Jean Hurst
Legislative Representative
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

Cc: Honorable Members, Senate Labor, Public Employment and Retirement Committee
The Honorable Eloise Gomez Reyes, State Senator
Alma Perez, Staff Director, Senate Labor, Public Employment and Retirement Committee
Jesse Herzer, Consultant, Senate Republican Caucus
Scott Seekatz, Consultant, Senate Republican Caucus

March 27, 2026

The Honorable Eloise Gomez Reyes
California State Senate
1021 O Street, Room 7210
Sacramento, CA 95814

Re: Senate Bill 951 (Reyes). Employment: technological displacement: notice.
Oppose Unless Amended (*as amended March 26, 2026*)

Dear Senator Reyes,

On behalf of the undersigned statewide organizations representing local educational and local government agencies we write to express our "oppose unless amended" position to your Senate Bill 951, related to workforce displacement or termination due to the adoption of certain technologies. Regrettably, this conflicts with well-established layoff notice and rehire statutory requirements in the education sector, as well as technology bargaining between other local government employers and employees. As such, we request that the bill be amended to exempt local educational agency (LEA) employers and local government employers from the bill's new requirements.

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(continued)

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In closing, SB 951 mandates costly administrative procedures for implementing and tracking in addition to liability exposure for complaints brought by any member of the public for possible violations. Further, this measure unfortunately interrupts practices already in place for public school employees who are laid off for reasons outside of job performance or disciplinary proceedings, and their rights to return to work.

For these reasons, we respectfully request that paragraphs (2) and (3) of subdivision (b) are removed from the definition of "employer" in Section 1414.1 of the bill. Thank you for your consideration and please do not hesitate to contact Dorothy Johnson, Association of

[1] *Tucker v. Grossmont Union High School District (2008)*

(continued)

California School Administrators Legislative Advocate, if you have any questions regarding our position at (916) 329-3807.

Sincerely,

Dorothy Johnson
Legislative Advocate
Association of California School Administrators

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Sarah Dukett
Policy Advocate
Rural County Representatives of California

Jean Hurst
Legislative Representative
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

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

April 2, 2026

The Honorable Sabrina Cervantes
California State Senate
1021 O Street, Suite 7330
Sacramento, CA 95814

RE: SB 970 (Cervantes) Military or overseas voters.
As Introduced February 3, 2026 - SUPPORT

Dear Senator Cervantes,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we are proud to support your Senate Bill 970. This measure would require the Secretary of State to develop regulations to facilitate the secure electronic return of ballots from military and overseas voters.

Counties support efficient and accessible voting for all. Election policies should aim to further our government's democratic republican nature by allowing and encouraging voting by a broad range of citizens, so that the government's decisions express the will of the people as fully as possible.

On July 23, 2025, the Secretary of State issued CCROV #25057, announcing that effective August 1, 2025, the Federal Voting Assistance Program discontinued its Department of Defense Fax Service. This service previously allowed military and overseas voters without access to a fax machine to return election materials, including voted ballots and completed Federal Postcard Applications, by fax to their county elections officials. As a result of this change, many military and overseas voters can no longer return ballots by fax and must now rely exclusively on overseas mail service, which can be lengthy and unreliable.

SB 970 would improve ballot return options for military and overseas voters by requiring the Secretary of State to promulgate regulations that facilitate the secure electronic return of ballots. California is currently one of only a few states that does not allow military and overseas voters to return a ballot electronically, other than by fax. This bill would modernize

CSAC Officers

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Santa Clara County

1st Vice President
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Kent Boes
Colusa County

Past President
Jeff Griffiths
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CEO
Graham Knaus

California's approach to military and overseas voting by improving the reliability and timeliness of ballot return for these voters.

For these reasons, we are pleased to support your SB 970. If you have any questions about our position, please do not hesitate to reach out to me at ejungwirth@counties.org.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

CC: The Honorable Scott Wiener, Member, California State Senate
Members and Consultants, Senate Elections and Constitutional Amendments
Scott B. Matsumoto, Principal Consultant, Senate Elections and Constitutional Amendments
Morgan Branch, Policy Consultant, Senate Republican Caucus

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

April 2, 2026

The Honorable Scott Wiener
Chair, Senate Elections and Constitutional Amendments Committee
1020 N Street, Room 533
Sacramento, CA 95814

RE: SB 970 (Cervantes) Military or overseas voters.
As Introduced February 3, 2026 - SUPPORT
To be heard in the Senate Elections and Constitutional Amendments Committee on April 7, 2026

Dear Chair Wiener,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we are proud to support Senate Bill 970 (Cervantes). This measure would require the Secretary of State to develop regulations to facilitate the secure electronic return of ballots from military and overseas voters.

Counties support efficient and accessible voting for all. Election policies should aim to further our government's democratic republican nature by allowing and encouraging voting by a broad range of citizens, so that the government's decisions express the will of the people as fully as possible.

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CSAC Officers
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2nd Vice President Kent Boes, Colusa County
Past President Jeff Griffiths, Inyo County
CEO Graham Knaus

overseas voters to return a ballot electronically, other than by fax. This bill would modernize California's approach to military and overseas voting by improving the reliability and timeliness of ballot return for these voters.

For these reasons, we are pleased to support SB 970 and respectfully request your AYE vote. If you have any questions about our position, please do not hesitate to reach out to me at ejungwirth@counties.org.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

CC: The Honorable Sabrina Cervantes, Member, California State Senate
Members and Consultants, Senate Elections and Constitutional Amendments
Scott B. Matsumoto, Principal Consultant, Senate Elections and Constitutional Amendments
Morgan Branch, Policy Consultant, Senate Republican Caucus

April 2, 2026

The Honorable Christopher Cabaldon
Chair, Senate Privacy, Digital Technologies, and Consumer Protection Committee
1020 N Street, Room 568
Sacramento, CA 95814

RE: Senate Bill 1159 (Cabaldon) – SUPPORT
As Amended March 25, 2026

Dear Chair Cabaldon:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counites (CSAC), Urban Counties of California (UCC), California Municipal Clerks Association (CMCA), and the League of California Cities (Cal Cities) we are pleased to support Senate Bill 1159, which would put important safeguards in place to protect the ability of the public to comment on matters before local agencies in an age of quickly evolving Artificial Intelligence (AI) technology.

California's open meeting and open governance laws are intended to not only allow the public to observe deliberations about issues that will affect their communities, but to participate as well. Local agencies accept public comment on matters both on the agenda and off. Technology has been a powerful tool to make public participation more accessible than ever, as agendas and the time and location of public meetings are posted online. Those unable to comment or observe in person are able to follow along online or submit written comments via email or web portal.

However, emerging AI and Large Language Model (LLM) tools have now made it easier than ever for bad actors to misrepresent public opinion in governance decisions. According to reporting from multiple outlets, in June 2025 a political consultant used AI tools to generate twenty thousand emails to the South Coast Air Quality Management District regarding a regulatory proposal before the board.[1] The AI generated emails purported to be from members of the public in South Coast AQMD's jurisdiction, but during an audit by air district staffers many said that they were not aware of signing onto any such messages. In an interview with a trade publication, the political consultant behind the advocacy effort bragged about how the volume "left the South Coast AQMD staff reeling."

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[1] An AI-powered campaign may have killed a key vote on air quality - Los Angeles Times
When the cloud comes for public comments - POLITICO
Residents deny sending emails pushing Bay Area air policy change – SF Chronicle

Automated engagement tools have the capacity to overwhelm government agencies, crowd out the voices of actual members of the public, and undermine the intent of California's transparent governance laws. Clarifying how these laws apply in the context of emerging technologies, particularly distinguishing between authentic public input and activity generated at scale by artificial intelligence systems, represents an important step toward protecting meaningful public participation, open governance, and critical staff resources for local agencies. With thoughtful refinement, SB 1159 will help address these challenges in a way that is both effective and implementable as technology continues to evolve quickly.

We appreciate the author's attention to this emerging challenge and the importance of safeguarding meaningful public participation in local governance. As this proposal moves forward, we look forward to working collaboratively with the author and stakeholders to develop amendments that ensure the bill's intent is both clear and effective, while remaining workable and practical for local agencies to implement.

For these reasons, RCRC, UCC, CSAC, CMCA, and Cal Cities are pleased to support SB 1159. Please do not hesitate to contact us if you have any questions.

Sincerely,

SARAH DUKETT
Senior Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

ERIC LAWYER
Senior Legislative Advocate
California State Association of Counties
elawyer@counties.org

JOHNNIE PIÑA
Legislative Advocate
League of California Cities
jpina@calcities.org

JEAN HURST
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

ETHAN NAGLER
Legislative Representative
California Municipal Clerks Association
enagler@publicpolicygroup.com

cc: Members, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

March 31, 2026

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

RE: **SB 1349 (Gonzalez) Taxation: tax expenditures: California Tax Expenditure Review Board.**
Notice of SUPPORT *(As Introduced on February 20, 2026)*

Dear Chair McNerney,

The League of California Cities (Cal Cities) and the California State Association of Counties (CSAC) are pleased to **support** SB 1349 (Gonzalez), which would establish the California Tax Expenditure Review Board to improve transparency, accountability, and oversight of major tax expenditures.

Counties and cities rely on stable and predictable state and local revenues to fund essential public services, including public safety, infrastructure maintenance, housing programs, and environmental protection. However, tax expenditures reduce General Fund revenues, which can in turn reduce funding available for programs and services that cities and counties depend on to serve their residents.

While tax expenditures are often adopted to achieve specific economic or policy goals, there is currently limited consistent oversight to evaluate whether these expenditures are meeting their intended outcomes. As a result, significant amounts of foregone revenue may not be achieving the desired benefits, while limiting resources available for critical public investments. When tax expenditures reduce available state resources without clear outcomes, counties and cities ultimately face the consequences through constrained funding, increased service demands, and limited capacity to address local priorities.

SB 1349 would establish a structured and transparent process to evaluate major tax expenditures by creating an independent review board and requiring comprehensive assessments conducted by the Legislative Analyst's Office. These assessments would examine key factors including fiscal impacts, economic outcomes, beneficiaries, and effects on the General Fund and education funding.

The bill would also require public meetings, public input, and legislative hearings, ensuring that tax expenditure decisions are informed by data, transparency, and stakeholder engagement. By requiring the board to make recommendations to the Legislature, SB 1349 would support more informed decision-making regarding the continuation, modification, or repeal of tax expenditures

For cities and counties, this improved transparency and accountability is critical. Ensuring that state resources are used effectively helps protect funding for programs that cities and counties rely on to deliver essential services and respond to community needs. Greater transparency and accountability in tax expenditures would support more sustainable state and local fiscal outcomes.

For these reasons, Cal Cities and CSAC **supports** SB 1349 (Gonzalez) and respectfully requests an "AYE" vote when the bill is heard in committee. If you have any questions, please do not hesitate to contact Ben Triffo (Cal Cities) at btriffo@calcities.org and Emma Jungwirth (CSAC) at ejungwirth@counties.org.

Sincerely,

Ben Triffo
Legislative Advocate
League of California Cities

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties

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

April 3, 2026

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

RE: AB 1660 (Schiavo) Public guardians and public administrators
As Introduced January 29, 2026 – SUPPORT
Set for hearing in Assembly Appropriations Committee on April 8, 2026

Dear Assemblymember Wicks:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Assembly Bill 1660 by Assembly Member Pilar Schiavo. This measure would compel financial institutions and third parties to promptly comply with lawful requests for information and property by Public Administrators (PA), Public Guardians (PG) and Public Conservators (PC), and allows courts to impose fines of no less than $1,000 when they fail to comply.

Under existing Probate Code, PAs, PGs, and PCs are granted the authority to secure property of conservatees and take control of a deceased's persons personal property, including bank accounts and safe deposit boxes. Unfortunately, it is common that banks – from large multinational institutions to small regional banks – deny or delay a Public Administrator or Public Guardian/Conservator request. Lack of compliance from financial institutions leads to unnecessary estate and guardianship complications and can worsen existing financial disputes.

AB 1660 strengthens existing Probate Code by imposing financial consequences on financial institutions for noncompliance with existing law. This measure will support efficient case management and administration for PAs, PGs, and PCs and help protect vulnerable clients from financial exploitation.

For these reasons, CSAC supports AB 1660. Should you have any questions regarding our position, please do not hesitate to contact me at bmccarthy@counties.org.

CSAC Officers

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

Sincerely,

Brendan McCarthy
Senior Legislative Advocate

CC: The Honorable Pilar Schiavo, Member, California State Assembly
Honorable Members and Consultants, Assembly Appropriations Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

April 2, 2026

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

RE: AB 2201 (Boerner) — SUPPORT

Dear Chair Bonta:

On behalf of our respective organizations, we are pleased to support AB 2201 (Boerner), which would reinstate four proven eligibility and renewal strategies to streamline Medi-Cal renewal processing and minimize wrongful terminations for low-income Californians.

With the implementation of H.R. 1 eligibility changes, including new work requirements for Medi-Cal participation and increased frequency of renewals from annual to every 6 months, California is bracing for 1.8 to 3 million Californians to lose Medi-Cal coverage due to paperwork and other administrative barriers. Counties are deeply invested in preventing Medi-Cal coverage losses because of the wide ranging consequences to low-income Californians – to those with behavioral health needs, to individuals experiencing homelessness, to justice involved individuals. Additionally, there are serious impacts to health equity, county indigent services, and public hospitals. It is important that California takes proactive steps to mitigate these impacts.

Counties have experience navigating large-scale eligibility transitions. During the Medi-Cal unwinding process in 2023, California implemented federal renewal streamlining strategies that reduced procedural terminations and doubled the automatic renewal rate. At the height of the unwinding, 92% of Medi-Cal disenrollments were for procedural or "paperwork" reasons. When the strategies ended on June 30, 2025, automatic renewal success was cut in half, resulting in hundreds of thousands of renewals that county workers must manually process each month. This workload is expected to grow further starting January 1, 2027, when counties must conduct renewals twice a year.

AB 2201 would reinstate four proven Medi-Cal renewal streamlining strategies: 1) auto-verification of zero income; 2) auto-verification of income at or below 100% of FPL; 3) auto-verification of stable income and assets; and 4) Streamlining Asset Verification System (AVS) workflows. These strategies would reduce county workloads, minimize wrongful terminations, and preserve staff capacity for complex cases, protecting thousands of Californians from losing their coverage.

AB 2201 would also reduce administrative and downstream healthcare cost savings to the state and counties. A 2015 estimate put the administrative cost of a single disenrollment and reenrollment at $400-$600. Individuals who lose and regain coverage also tend to incur higher

costs due to delayed treatment. Maintaining continuous coverage therefore mitigates avoidable healthcare costs and reduces the pressures on county indigent care programs.

For these reasons, we are pleased to support AB 2201 and respectfully request your 'AYE' vote.

Sincerely,

Amanda Kirchner
Director of Legislative Advocacy
Counties Welfare Directors Association

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

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

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

Katie Rodriguez
Interim CEO & President
California Association of Public Hospitals & Health Systems (CAPH)

Brendan McCarthy
Senior Legislative Advocate
California State Association of Counties (CSAC)

April 1, 2026

The Honorable Jesse Arreguín
Chair, California State Senate Housing Committee
1021 O Street, Suite 3330
Sacramento, CA 95814

RE: **SB 1117 (Cervantes) Accessory dwelling units and junior accessory dwelling units**
Notice of OPPOSITION *(As of 2/17/2026)*

Dear Chair Arreguín,

The League of California Cities (Cal Cities), the California Special Districts Association (CSDA), the California Association of Recreation and Park Districts (CARPD), and the California State Association of Counties (CSAC) regretfully must oppose **SB 1117 (Cervantes)** which would limit the amount of impact fees a local government could charge on an Accessory Dwelling Unit (ADU) more than 750 square feet.

Local governments and planners appreciate the need to provide builders with some level of certainty regarding the fees and other conditions applicable to their proposed development before they make substantial investments in pursuing the development. However, that certainty often comes with social costs. The roads, fire stations, water and sewer infrastructure, parks, recreational facilities, and other necessary assets that will serve future residents of the development or mitigate the development's environmental impacts are not without cost. The quality of these public assets is often a key factor in making new development attractive and marketable. Prospective residents are unlikely to choose communities with inadequate public services.

SB 1117 completely disregards the Mitigation Fee Act (MFA), which strictly regulates how local agencies impose impact fees. Under the MFA, impact fees must be limited to the specific service and may cover only the cost of providing that service. Arbitrarily capping these fees would prevent the development of the public improvements and services necessary to meet the needs of residents living in the newly constructed ADU. Further, the inability to ensure that the applicable fees will generate sufficient funding to construct the necessary facilities within a reasonable timeframe may make it more difficult to rely on those fee mechanisms as mitigation for environmental impacts, thereby encouraging legal challenges and consequent delays.

Development impact fees—grounded in required nexus studies rather than set arbitrarily—serve as a critical, and in some cases the only, funding source for local

governments with limited revenue options. Nexus studies require evidence-based reasoning to validate the proposed fees and cover the reasonable cost of providing the service, which local governments must complete before adopting impact fees under the Mitigation Fee Act. Without these funds, many jurisdictions lack the ability to build essential public facilities.

Effectively addressing California's housing crisis requires aligning housing production with investments in infrastructure, since communities cannot be healthy, equitable, or livable without the facilities these fees support. Our organizations strongly support housing, development, and economic growth, and we are committed to partnering with those actively building housing to help solve the crisis.

For these reasons, the undersigned organizations regretfully must oppose **SB 1117 (Cervantes)**. If you have any questions, do not hesitate to contact us.

Sincerely,

Brady Guertin
Legislative Advocate
League of California Cities
bguertin@calcities.org

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California Special Districts Association
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Mark Neuburger
Legislative Advocate
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Cc: The Honorable Sabrina Cervantes
Members, Senate Housing Committee

March 18, 2026

To: The Honorable Caroline Menjivar
Chair, Senate Budget Subcommittee No. 3

Honorable Members
Senate Budget Subcommittee No. 3

The Honorable Dr. Corey Jackson
Chair, Assembly Budget Subcommittee No. 2

Honorable Members
Assembly Budget Subcommittee No. 2

RE: Opposition to In-Home Supportive Services (IHSS) Budget Reductions and Support for TBL to Minimize Harm from the IHSS Community First Choice Option (CFCO) Penalties

Dear Chair Menjivar, Chair Jackson, and Members:

On behalf of the undersigned organizations, we write to express our strong opposition to proposed reductions to the In-Home Supportive Services (IHSS) program in the Governor's 2026–27 Budget that would have grave consequences for consumers. We urge the Legislature to reject these proposals as they would negatively impact our most vulnerable older adults and persons with disabilities, and we also urge the Legislature to adopt statutory changes that preserve the current 50/50 cost sharing arrangement between the State and counties for the Community First Choice Option (CFCO) penalties.

The Administration has cited significant growth in overall costs of the IHSS program; however this should not only be expected, but celebrated. Between 2010 and 2022, the population of Californians 65 and older increased by 44% (usafacts.org). IHSS enables nearly 900,000 older adults and people with disabilities to remain safely in their homes and communities, avoiding costly institutional care incurred in the Medi-Cal Program, through assistance with daily living tasks such as meal preparation, assistance at medical appointments, assistance with the administration of life-saving medication, and other life-saving personal care services.

IHSS is a critical component of California's Master Plan for Aging, the State's blueprint to address the needs of this growing population. By 2040, that population will increase by 59 percent (Public Policy Institute of California). At the same time demand is accelerating, counties that administer the IHSS program are being asked to absorb additional costs without the staffing or resources necessary to meet state mandates for timely and complete intakes and reassessments, which means older adults and persons with disabilities could experience longer waiting times for their assessments, potentially resulting in rushed assessments, that ultimately can jeopardize the safety of those who need, and are entitled to, IHSS services.

Shifting Growth Costs to Counties Will Directly Harm Recipients. The Governor's Budget proposes eliminating the state's share of cost associated with growth in IHSS hours provided to recipients (a $233.6 million General Fund shift to counties), beginning in FY 2027-28. By pushing $233.6 million in new costs onto counties (an amount that is expected to grow each year based on the growing aging population), the state creates incentives for counties to reduce or deny hours clients genuinely need or find other ways to reduce

local costs. Those savings could come at the expense of the state-mandated collective bargaining between counties and provider unions for fair wages and benefits for IHSS providers, the latter of which would reduce available providers and therefore access to quality of care for IHSS recipients. Either outcome is catastrophic for IHSS recipients.

Although framed as fiscal shifts or adjustments, the effect is clear: counties will be forced to reduce access to IHSS or other critical county health and human services as these costs are above what counties can afford within Realignment. This cost shift would also occur at a time when counties are facing billions of dollars in increased health and human services costs as a result of the implementation of H.R. 1. When counties are pushed to reduce hours or not increase provider wages and benefits, clients pay the price. For an older adult with a disability, losing even a few hours of care can mean missed meals, avoidable injuries, or the inability to remain safely at home. A reduction in hours is not just an inconvenience; it is a safety risk that can lead to hospitalization or institutional care.

Eliminating the IHSS Backup Provider System (BUPS) Puts Recipients in Emergency Situations At Risk. The Governor's Budget proposes to eliminate BUPS (a $3.5 million General Fund reduction). BUPS prevents gaps in care when a regular IHSS provider is unavailable by matching IHSS recipients with short-term providers. According to the California Association of Public Authorities (CAPA), in FY 2024-25 over 4,100 requests were submitted to BUPS, and almost 2,500 were fulfilled. Note that CAPA could not gather data from all 58 counties, and as of this date CDSS has not provided requested data for all 58 counties, but we believe it is likely that the number of requests received and fulfilled is higher. Eliminating BUPS would leave recipients with no safety net, creating service gaps for consumers who rely on backup providers in emergency situations. Consumers with the most complex needs, especially those relying on backup providers, will face increased health risks and potential institutionalization. We also note that the BUPS was already reduced in the FY 2024-25 Budget by $3 million General Fund to true up to utilization of the program.

We urge the Legislature to reject the Governor's proposals to remove the state's share of cost for growth in IHSS hours and its associated trailer bill language (TBL) and to eliminate the BUPS program.

Shifting Full CFCO Penalties to Counties Will Worsen Delays for Recipients. CFCO serves individuals with the highest needs, those who would otherwise require nursing facility-level care, making it a vital component of California's long-term services and supports system. The current policy of the 50 percent state / 50 percent county split in covering the costs of federally-imposed CFCO penalties has already had a negative impact on clients and their providers: potential IHSS clients are waiting longer to be authorized for their IHSS services by counties, and non-CFCO IHSS recipients are waiting longer to have their service needs reassessed and updated based on their needs (often needing increases as they age). Their providers—72.7 percent of whom are related family members (as of January 2026)—may be put in the difficult position of either providing uncompensated care or seeing their IHSS recipient struggle with unmet need.

Delays in assessments and reassessments can result in unmet care needs, increased risk of injury, and greater likelihood of institutionalization. The latest data from CDSS shows late applications have nearly tripled from July to December 2025, adding 3,000 more cases to an already strained system. This means there are 3,000 additional people waiting longer for IHSS services. These outcomes undermine the fundamental purpose of IHSS and CFCO.

The below stories from real IHSS recipients and applicants show the potentially detrimental impact the penalties are having on vulnerable Californians:

"Dan", an 80-year-old who lives alone, currently receives domestic and related services with minimal personal care, funded through PCSP (i.e., not CFCO), and uses a registry provider. As Dan's condition begins to decline, he requests a change-in-condition assessment to increase his hours. However, because CFCO cases are being prioritized to avoid fiscal penalties, his assessment is significantly delayed. During the waiting period, Dan's safety deteriorates and he goes without the additional help he urgently needs.

An adult son submitted an IHSS application on behalf of their father in October. Due to the prioritization of CFCO cases, the county advised an assessment would not occur for 2–3 more months. The applicant has 11 different medical diagnoses, and his family has been advised by his physician to not leave him alone. The delay places him at risk of injury and may jeopardize his ability to safely remain at home.

These experiences are not isolated incidents, but reflect a statewide pattern as CFCO penalties increasingly drive workload decisions. These harms may grow if the state shifts the full penalty burden to counties.

The state's policy has accomplished its intended goal: counties have largely caught up on late CFCO reassessments, and federal penalties have significantly declined. According to CWDA, the federal penalty amounts incurred this Fiscal Year have totaled $15.4 million total ($7.7 million assessed to counties). The projected penalties are on track to be well below the projected $40.5 million total penalties projected for FY 2025-26 and $92.1 million projected for FY 2026-27. However, county IHSS administration is chronically and deeply underfunded—by $246 million based on estimates by the California Department of Social Services[1]. This has resulted in high social worker caseloads in many counties, and county social workers must keep shifting their priorities of focus between intakes and reassessments.

Shifting 100% of penalty costs to counties would undermine counties' efforts to catch up with delayed intakes and non-CFCO reassessments. It is critical that we do no further harm to older adults and persons with disabilities who are seeking or are currently receiving IHSS services.

To address this issue, we urge the Legislature to adopt TBL that would maintain the current 50/50 cost-sharing arrangement between the State and counties for CFCO penalties. Specifically, the proposed TBL would do the following:

- Maintain the current 50/50 state-county cost-sharing arrangement for CFCO penalties
- Make county penalty payments contingent on CDSS providing specific information to counties to allow for county-level financial reconciliation and documentation
- Exempt cases that move counties or return from leave from penalty calculations for 30 days after notifying the county of the change
- Clarify that the penalty is specific to overdue CFCO reassessments

See Attachment A for the full text of the proposed TBL.

[1] California Department of Social Services (CDSS). "In-Home Supportive Services (IHSS) Administrative Reassessment Methodology." May Revision 2025. Document provided to stakeholders; not publicly posted. *This document was provided by CDSS to program stakeholders as part of the 2025 May Revision budget process and was not posted publicly on the CDSS website.*

IHSS is not simply a budget line; it is the lifeline that keeps nearly 900,000 Californians safe, housed, and cared for in their own homes and communities. The proposed budget reductions and cost shifts threaten the stability of the entire program and will inevitably, and profoundly, harm the consumers who rely on it.

We urge the Legislature to protect IHSS, preserve the current cost sharing structure, and reject proposals that undermine access to essential in-home care before harm is done to California's seniors, persons with disabilities, and their providers.

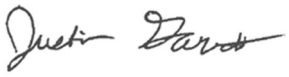
Thank you for your consideration and for your continued commitment to preserving and strengthening California's long-term services and supports system.

Sincerely,

Carlos Marquez III

Executive Director

County Welfare Directors Association



Justin Garrett

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Disability Rights California

Elizabeth Zirker

Senior Attorney

National Health Law Program

Hagar Dickman

Director, California Long-Term Services and Supports Advocacy

Justice in Aging

Attachment A: Proposed CFCO TBL

Amend the Welfare and Institutions (W& I) Code Section 12306.16 (d)(7) to read:
(7) *(A)* Beginning July 1, 2026, if the state ceases to receive enhanced federal financial participation for the provision of services pursuant to Section 1915(k) of the federal Social Security Act (42 U.S.C. Sec. 1396n(k)) due to noncompliance of timely case reassessment for the Community First Choice Option program, the *state and county shall each pay 50 percent of the amount of lost* ~~county shall pay, separate from the rebased County IHSS MOE payment, a 100-percent share of the~~ enhanced federal financial participation that would have been received pursuant to Section 1915(k) of the federal Social Security Act (42 U.S.C. Sec. 1396n(k)) for the months in which the state did not receive the enhanced federal financial participation. ~~For the 2025–26 fiscal year, the state and county shall each pay 50 percent of the amount of lost enhanced federal financial participation described in this paragraph.~~ *Counties shall only be held responsible for their share of the enhanced federal financial participation due to case-specific penalty assessments associated with noncompliance of timely reassessment for their individual county.* The department shall develop guidance, in consultation with the County Welfare Directors Association of California, to implement this paragraph.

(B) Any case that has changed addresses to an address that is outside of their prior county, and any cases that have returned from leave status, shall be exempted from a penalty assessment for 30 days from the date of notification to the county and shall not be included in the penalty determination. The department shall develop guidance, in consultation with the County Welfare Directors Association of California, to implement this paragraph.

(C) County payment for its share of the lost enhanced federal financial participation due to federal fiscal penalties, pursuant to paragraph (A), shall be contingent upon the department providing the county with timely and sufficient data necessary to reconcile overdue reassessments. Data shall include, recipient case number and status for each affected reassessment, social worker assigned to that case, hours paid per case used to calculate the penalty, the methodology used to calculate the penalty, the date and time the data used to calculate the penalty was pulled, the penalty amount attributed to each case, and the total penalty cost for each case attributed to the county. The department shall provide quarterly data to the County Welfare Directors Association that includes the total amount of fiscal penalties paid to the federal Centers for Medicare and Medicaid and total amounts charged to counties for federal penalties for reconciliation.

March 19, 2026

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

RE: **AB 1621 (Wilson) Planning and Zoning Law: Post-entitlement Phase Permits: Housing Accountability Act**
Notice of OPPOSE UNLESS AMENDED *(As of 3/4/26)*

Dear Chair Carrillo,

The League of California Cities (Cal Cities),the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC) must regretfully take a position of Oppose Unless Amended on **AB 1621 (Wilson)**, which would eliminate the ability of local governments to require more than two plan checks on a building permit application unless the local agency can make a written finding based on substantial evidence that additional review is necessary to address a specific, adverse impact on public health and safety. This bill also prohibits a local or state agency from requiring remediation of any non-compliant conditions if it is a deviation from a previously approved building plan, even if that condition adversely impacts public health and safety. While we appreciate and share your desire for prompt review and approval of post-entitlement phase permits, AB 1621 would create practical and policy concerns impairing local government's ability to review applications for residential development projects effectively.

Plan review of construction projects is an integral step in ensuring that structures built in California are safe for occupants, the surrounding environment, and the community. City and county building and planning departments review plans based on consistency with the jurisdiction's General Plan, state building codes, and associated regulations. In addition to health and safety issues, which local governments must implement and enforce, regulations may also encompass other goals not directly related to health and safety, such as parking, air quality regulations, or solar energy systems. As currently drafted, this measure would prohibit a local agency from denying an application on non-health-and-safety grounds, effectively allowing developers to circumvent other necessary regulations adopted at the state and local levels.

Further, provisions in Section 2 of the bill prohibit a state or local agency from requesting any action, or inaction, that would bring a project into compliance with building standards if that would deviate from previously approved building plans or approved building permits, unless the agency can prove both: (1) a reasonable person couldn't interpret the previous approval of meeting the building standards as valid; and, (2) that

the deviation from building standards was necessary to address specific adverse impacts. In other words, if it can be shown that a reasonable person, not a trained professional with knowledge of building codes, could find that the building is compliant and meets the applicable standards, then the agency has no recourse for ensuring conditions meet the requirements of the law, even if those conditions impact public health and safety. This provision removes all ability of state and local agencies to ensure compliance with building standards set at the state and local levels for the protection and welfare of California residents.

Lastly, AB 1621 does not address incomplete or noncompliant applications, which may require additional plan checks. When an application is incomplete or incorrect through no fault of local staff, they work directly with the applicant to ensure compliance with state and local regulations.

Cal Cities, CSAC and RCRC have provided amendments to the author's office and the sponsors that would remove our opposition. Specifically, we have requested the author to consider the following language: "(C)(i) As part of its review, the local agency shall not require or request more than two plan check and specification reviews in connection with an application for a building permit, unless the local agency's requirement or request for additional review is accompanied by **written findings identifying the permit standard(s) which the plans do not comply**. ~~based on substantial evidence in the record that the additional review is necessary to address a specific, adverse impact on public health or safety~~." Additionally, Government Code Section 65913.3(d)(5), which removes agencies' discretion to compel compliance with state and local building codes, should be repealed in its entirety. These changes would ensure local agencies have the tools they need to enforce all local regulations while providing certainty and clarity to the project applicant. Additionally, it would eliminate the potential for litigation and uncertainty in a development project due to the repeated cycle of restarting the entire permit review process after permit denial.

For these reasons, Cal Cities, CSAC, and RCRC regretfully must take a position of oppose unless amended on **AB 1621 (Wilson)**. Our organizations appreciate the author's willingness to work with stakeholders to address these concerns and look forward to working together to find solutions and address this very important issue. If you have any questions, do not hesitate to contact Brady Guertin (Cal Cities) at bguertin@calcities.org or Mark Neuburger (CSAC) at mneuburger@counties.org or Tracy Rhine (RCRC) at trhine@rcrcnet.org.

Sincerely,

Brady Guertin
Legislative Advocate, Cal Cities

Mark Neuburger
Legislative Advocate, CSAC

Tracy Rhine
Senior Policy Advocate, RCRC

Cc: The Honorable Lori Wilson

American Planning Association
California Chapter
Creating Great Communities for All

RCRC
RURAL COUNTY REPRESENTATIVES OF CALIFORNIA

CSAC

March 19, 2026

The Honorable Pilar Schiavo
California State Assembly
1021 O Street, Room 4140
Sacramento, California 95814

SUBJECT: AB 1914 (Schiavo), General plan elements: childcare.
Oppose Unless Amended (as introduced 2/12/26)

Dear Assemblymember Schiavo,

The American Planning Association, California Chapter (APA California), the Rural Counties of California (RCRC) and the California State Association of Counties (CSAC) must respectfully oppose AB 1914 unless amended to address several implementation concerns. As introduced, AB 1914 would require a local jurisdiction, upon the next update of two or more elements of the general plan on or after January 1, 2028, to review and update the land use, circulation, housing, safety, and environmental justice elements—and any other element, where appropriate—to address the childcare needs of the jurisdiction.

RCRC is an association of forty rural California counties, and the RCRC Board of Directors is comprised of elected supervisors for each of those member counties. CSAC represents all 58 counties in the state. APA California is a non-profit organization made up of practicing planners, citizens, and public officials committed to advancing the practice of local, regional, and statewide planning throughout California.

As reflected in the APA California Legislative Platform, Plan California, we support thoughtful, comprehensive planning that promotes public health and safety, environmental sustainability, and resilient communities. However, APA California has growing concerns with the increasing number of General Plan mandates adopted in recent years for specific issues that may be more effectively addressed through other planning and regulatory tools.

Planners and Local Governments recognize the importance of expanding access to childcare and have supported the Legislature's efforts to remove barriers to childcare providers. However, it is unclear what additional barriers a General Plan update would resolve. General Plans are long-range policy documents intended to provide high-level guidance and are not designed to be amended frequently. Instead, ordinances, zoning codes, and implementation programs are the

tools through which specific uses and regulatory changes are addressed. Simply put, not every issue is best addressed through the General Plan.

Existing Regulatory Relief for Childcare Facilities

California law already treats small and large licensed family childcare homes as residential uses permitted by right for zoning purposes. Recent legislation has further reduced barriers by limiting fees, expanding by-right permitting for certain childcare facilities, and providing targeted CEQA exemptions. APA California and Counties supported these efforts and continues to support their effective implementation. These types of targeted reforms provide a more direct and effective pathway for expanding childcare facilities than a broad General Plan mandate.

General Plan Updates Not Always the Right Tool

AB 1914 would require cities and counties to undertake a substantial, multi-element update to their General Plans—effectively requiring revisions to at least five of the seven mandatory elements. The issue is not whether childcare is important—it is whether the General Plan mandate is the appropriate mechanism to deliver it.

While General Plans can establish policies and goals, they do not directly result in childcare facility development. Instead, facility delivery is driven by implementation programs, licensing, financing, and site-specific feasibility. As proposed, the bill risks creating a significant planning exercise without addressing the core barriers to expanding childcare capacity.

APA California is happy to work with you on alternative approaches that provide greater flexibility to jurisdictions while more directly supporting childcare development. Tools such as specific plans, targeted ordinances, technical assistance, and continued streamlining of permitting and licensing processes would better align with the bill's intent and allow for more timely implementation.

Lack of Resources and Cumulative Mandates

Local jurisdictions are already working to implement a growing number of state-mandated planning requirements. Many lack the staffing and financial resources needed to keep pace with these cumulative obligations. AB 1914 explicitly provides that no reimbursement is required for the new duties imposed on local agencies, creating a significant unfunded mandate.

This will require substantial staff time, public process, and technical analysis, potentially diverting limited resources away from implementation-focused efforts that more directly support

childcare providers. While jurisdictions may impose fees to offset costs, it can take years to recover those expenses, and such fees may conflict with broader legislative concerns about development costs. In a challenging fiscal environment for both the state and local governments, we urge the Legislature to consider more flexible and implementable approaches that account for local capacity constraints.

APA California, RCRC and CSAC remain committed to working collaboratively with the author and Legislature to advance effective and implementable childcare policies. However, without amendments to address the concerns outlined above, we must respectfully oppose AB 1914. If you have any questions, please contact Lauren De Valencia, Stefan/George Associates, APA California's lobbyist, at 916 443-5301, lauren@stefangeorge.com, Tracy Rhine for RCRC at trhine@rcrcnry.org or Mark Neuburger with CSAC at mneuburger@counties.org.

Sincerely,

Reuben Duarte
Vice President Policy and Legislation
APA California

Tracy Rhine
Senior Policy Advocate
RCRC

Mark Neuburger
Legislative Advocate
CSAC

cc: Members and Consultant, Assembly Local Government Committee
Members and Consultant, Assembly Human Services Committee
Assembly Republican Caucus
The Governor's Office
The Office of Land Use and Climate Innovation

American Planning Association
California Chapter
Creating Great Communities for All

RCRC
RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

CSAC

1121 L Street, Suite 606, Sacramento, CA 95814
916.443.5301

March 20, 2026

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

Re: **AB 1898 (Schultz): Workplace artificial intelligence tools.**
As amended March 12, 2026 – OPPOSE
To be heard in Assembly Committee on Privacy and Consumer Protection on March 25, 2026

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), League of California Cities (Cal Cities), the Association of California Healthcare Districts (ACHD), Association of California School Administrators (ACSA), California Association of School Business Officials (CASBO), and Public Risk Innovation, Solutions, and Management (PRISM), we write in respectful opposition to AB 1898 (Schultz), 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.

We have fundamental concerns with this and other bills that aim to restrict how public agencies can use tools which we believe are essential and, in many cases, routine tools used for security.

- We oppose any legislation that will compromise health, safety, and security for our employees, the public we serve, and our officials.
- We oppose any legislation that compromises our ability to conduct investigations into fraud, waste, or abuse.
- We do not believe it is appropriate to regulate tools used for security and basic operations in response to private sector labor concerns. State law has protected the

> right of public employees to bargain and public employees have a property interest in their position that is protected by due process[1].

AB 1898 would impose several rules on how public agencies may use surveillance tools – a term that is vast in its application, including video cameras, ID badge or key fob access, workplace messaging applications (e.g. Microsoft Teams or Slack), and a wide array of tools used to keep workplaces safe, conduct essential government services, and protect against abuse, fraud, and waste of public resources.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life, particularly as new technologies emerge. However, this bill and others aimed at limiting employers' use of critical technology are too broad, too expensive, and too dangerous for public agencies and those we serve.

Allows veto of security tool by single employee or contractor

AB 1898 would require public agencies to provide a written notice that a workplace AI/ADS tool was used to assist the employer in making employment-related decisions or to surveil the workplace. They must notify employees, exclusive representatives, and independent contractors, likely to be directly or indirectly affected, at least 90 days before introducing a workplace AI tool, which includes both a workplace surveillance tool and an automated decision system, and notify new employees and contractors upon hire, or within a month after the bill takes effect for tools already used in the workplace. The bill then requires notice to all employees and independent contractors at least once annually.

The notice must contain, among other things, detailed information on the workplace surveillance tool or automated decision system justification, uses, worker data information including description, collection, storage, access, and uses, detailed technical and other information about the workplace surveillance tool or automated decision system, a description of the general locations and the specific activities, communications, and job roles that will be surveilled and the technologies that will be used, quota information, training information, and information about whether any jobs or job tasks will be replaced or automated by the technology.

Proposed Labor Code § 1601(c) allows a single employee or independent contractor to veto the use of tools used for essential security, operational, or office functions, including security cameras or work email. The bill not only requires notice to employees, but this section **prohibits the use** of AI/ADS or a "workplace surveillance tool," **until workers sign and return a notice**. This provision alone raises profound concerns for the security and operations of public agencies and the public at large. A single individual could, intentionally or not, prevent a school from using emergency alerts, turn off security cameras at an election facility, or allow police officers to stop using body cameras.

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

It also raises significant concerns regarding the labor rights of the public workforce, as a single independent contractor could overrule the decisions of the public workforce for an agency, even if the use of certain tools has been bargained in an MOU. This raises significant concerns regarding the rights of public employees and could place public agencies with the choice of violating MOUs and the Meyers-Milias-Brown Act or facing the steep penalties that would be imposed through this bill.

Endangers public resources
Section 1601(f) requires public agencies to notify employees about how a surveillance tool is used, including the purpose of a surveillance tool, the make and model of the tool to be used, the job roles to be monitored, the locations where they will be monitored, which technologies will be used, and how often they will be used. Many of these requirements will frustrate routine uses of technology and undercut public agencies' efforts to secure their facilities, public data, finances, and protect employees and the public alike.

Undermines fraud and abuse prevention and investigation
Public agencies are responsible for delivering essential public services and protecting against fraud, waste, and abuse of public resources. Imagine a public agency is concerned that an employee is committing fraud by creating a shell company and signing false invoices used to pay for lavish gifts and cash[2]. Under section 1601(f)(6), the agency would be required to inform the employee about what tools they are using to investigate them, inform them about job roles they are monitoring, which technologies will be used, and why they are using them. Put simply, AB 1898 could make the fraudster aware that they are being investigated, how they are being investigated, and why they are being investigated.

These same concerns apply to necessary efforts by public agencies to investigate claims of abuse of minors, excessive force, workplace violence, stalking, harassment, threats to public officials, or corruption.

Exposes government agencies to physical and cybersecurity risks
Section 1601(f)(7) would require public agencies to include the specific make and model of each AI/ADS and workplace surveillance tool. Disclosure of this information, along with the requirements to report the locations, could provide a material advantage to bad actors seeking to exploit vulnerabilities or gaps in security 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

[2] https://www.justice.gov/usao-edca/pr/former-state-employee-sentenced-over-5-years-prison-2m-scheme-defraud-office-aids

governments are responsible for securing and operating critical infrastructure, jails, hospitals, police and fire departments, and providing behavioral health services and shelters for the unhoused.

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, and benefits officers, among myriad other examples.

Reporting and publication of the detailed information required by AB 1898 could set back public employers' efforts to protect employees and the public.

Inappropriately applies to public agencies
The sponsors are advancing this bill, in part, to address activities by employers that undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union organizing and bargaining 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.

Exposes public agencies to severe litigation risk and steep penalties
AB 1898 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague, sweeping, and littered with unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per employee for each violation. The County of Los Angeles employs over 100,000. A single violation to the county would cost upwards of $50,000,000.

Put simply, public agencies use the tools restricted by this bill to protect public resources, not to influence employee organization activities. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1898 and urge your "NO" vote.

Sincerely,

Eric Lawyer
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Dorothy Johnson, Legislative Advocate
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Mishaal Gill
Director of Policy and Advocacy
California Association of School Business Officials
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CC: The Honorable Nick Schultz, Member, California State Assembly
Members and Consultants, Assembly Committee on Privacy and Consumer Protection
Josh Tosney, Chief Consultant, Assembly Committee on Privacy and Consumer Protection
Liz Enea, Policy Consultant, Assembly Republican Caucus

March 18, 2026

The Honorable Juan Carrillo
Chair, Assembly Local Government Committee
1020 O Street, Suite 157
Sacramento, CA 95814

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As introduced February 20, 2026 – SUPPORT
To be heard in Assembly Local Government on March 25, 2026

Dear Chair Carrillo:

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), and League of California Cities (Cal Cities), we are pleased to support Assembly Bill 2640 (Hadwick), which we believe provides sensible fiscal relief and the fiscal flexibility necessary for efficient, modern governance by local agencies. The state mandate reimbursement process, and administrative issues therein generally, have long burdened local governments and our organizations continue to support efforts to reform the current process.

Reimbursable State Mandate Process: Long and Uncertain
Every year, the Governor signs, on average, more than 1,000 bills and enacts new laws in the interest of governing California. Many new laws require local governments to implement new programs or provide new services. Laws that require local government entities to implement new programs or provide higher levels of service to the public are often referred to as "reimbursable state mandates," a term of art particular to California.

Local governments are required to comply with all laws that create new state-mandated programs and services. When those new initiatives do not come with an appropriation of funds to carry them out, local governments only receive funding to carry out many state-mandated programs through reimbursement payments from the state long after the fact, and only when a state body has adjudicated the matter through a convoluted claims process.

Reimbursement for local governments to comply with new state-mandated programs is not automatic. Local governments initiate the process to receive reimbursement approval via

the Commission on State Mandates, which may take a year or more to determine whether the new law meets the constitutional criteria for reimbursement—and even longer to establish a process and rate for reimbursement. Therefore, local governments comply with new costly laws pending reimbursement status, often funding these programs alone for years, facing the uncertainty of reimbursement. Local governments comply with all other state mandates using local revenues.

Backlog of Unreimbursed State-Mandated Costs Owed to Local Governments

Over the years, the state has accrued a significant backlog of funds owed to local governments for work performed to carry out state-mandated projects. According to the State Controller's Office[1], as of October 2025 the state owes local governments collectively $910.9 million, including estimated accrued interest. This nearly $1 billion figure includes funds owed for claims for active state-mandated programs, unpaid claims from prior fiscal years, and outstanding "incorrect reduction" claims filed with the Commission on State Mandates.

How This Measure Helps

Even after a reimbursement is issued, an audit or review by the State Controller's Office may reduce the reimbursement amount paid by disallowing previously approved payments years after the fact. When the State Controller's Office disallows costs previously claimed by counties, the affected county may choose to either remit the disallowed amount to the state, or the State Controller's Office offsets (withholds) commensurate amounts from state-mandated costs reimbursements filed by that county in subsequent fiscal years. Either way, the local government then must pay that disallowed amount back to the state. These repayments must occur even if the state has other outstanding debts owed to that local government. For some local governments, especially communities with constrained budgets, repaying even a portion of their reimbursement claims causes fiscal strain.

This measure will authorize the Controller to allow a local government to offset any reduced reimbursement from other unpaid reimbursement claims occurring on or after January 1, 2027. This change would provide local governments with financial relief instead of allowing the state to claw back funds while still owing debts to that same local government. This mechanism supports cash-strapped local governments and retains critical funding for under-resourced communities.

Local governments continue to support efforts to modernize the state mandate claiming and reimbursement process. AB 2640 represents a modest, but important, step towards these reform efforts and provides needed fiscal flexibility for local agencies. For these reasons, we are pleased to support AB 2640. Should you have any questions regarding our position, please do not hesitate to contact us.

[1] State Controller's Office AB 3000 State-Mandated Program Cost Report of Payments and Appropriations (October 31, 2025)

Sincerely,

Emma Jungwirth
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Ben Triffo
Legislative Affairs, Lobbyist
League of California Cities
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CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Assembly Local Government Committee
Angela Mapp, Chief Consultant, Assembly Local Government Committee
Tobias Wolken, Consultant, Assembly Republican Caucus

March 17, 2026

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

RE: Senate Bill 1159 (Cabaldon) – SUPPORT
As Introduced February 18, 2026

Dear Chair Umberg:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counites (CSAC), Urban Counties of California (UCC), and the League of California Cities (Cal Cities) we are pleased to support Senate Bill 1159 (Cabaldon), which would put important safeguards in place to protect the ability of the public to comment on matters before local agencies in an age of quickly evolving Artificial Intelligence (AI) technology.

California's open meeting and open governance laws are intended to not only allow the public to observe deliberations about issues that will affect their communities, but to participate as well. Local agencies accept public comment on matters both on the agenda and off. Technology has been a powerful tool to make public participation more accessible than ever, as agendas and the time and location of public meetings are posted online. Those unable to comment or observe in person are able to follow along online or submit written comments via email or web portal.

However, emerging AI and Large Language Model (LLM) tools have now made it easier than ever for bad actors to misrepresent public opinion in governance decisions. According to reporting from multiple outlets, in June 2025 a political consultant used AI tools to generate twenty thousand emails to the South Coast Air Quality Management District regarding a regulatory proposal before the board.[1] The AI generated emails purported to be from members of the public in South Coast AQMD's jurisdiction, but during an audit by air district staffers many said that they were not aware of signing onto any such messages. In an interview with a trade publication, the political consultant behind the advocacy effort bragged about how the volume "left the South Coast AQMD staff reeling."

Automated engagement tools have the capacity to overwhelm government agencies, crowd out the voices of actual members of the public, and undermine the intent of California's

[1] An AI-powered campaign may have killed a key vote on air quality - Los Angeles Times
When the cloud comes for public comments - POLITICO
Residents deny sending emails pushing Bay Area air policy change – SF Chronicle

transparent governance laws. Clarifying how these laws apply in the context of emerging technologies, particularly distinguishing between authentic public input and activity generated at scale by artificial intelligence systems, represents an important step toward protecting meaningful public participation, open governance, and critical staff resources for local agencies. With thoughtful refinement, SB 1159 will help address these challenges in a way that is both effective and implementable as technology continues to evolve quickly.

We appreciate the author's attention to this emerging challenge and the importance of safeguarding meaningful public participation in local governance. As this proposal moves forward, we look forward to working collaboratively with the author and stakeholders to develop amendments that ensure the bill's intent is both clear and effective, while remaining workable and practical for local agencies to implement.

For these reasons, RCRC, UCC, CSAC, and Cal Cities are pleased to support SB 1159. If you should have any questions, please do not hesitate to contact us.

Sincerely,

SARAH DUKETT
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cc: The Honorable Chrisopher Cabaldon, Member, California State Senate
Members, Senate Judiciary Committee
Members, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Margie Estrada, Chief Counsel, Senate Judiciary Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

March 17, 2026

The Honorable Rhodesia Ransom
Chair, Assembly Committee on Emergency Management
1020 N Street, Room 360B
Sacramento, CA 95814

RE: AB 1934 (Bennett) State Fire Marshal: home hardening certification program.
As introduced on February 13, 2026 – SUPPORT
To be heard in the Assembly Emergency Management Committee on March 23, 2026

Dear Chair Ransom,

The California State Association of Counties (CSAC), League of California Cities (Cal Cities), and Rural County Representatives of California write in **support** of Assembly Bill 1934 (Bennett) regarding a home hardening certification program.

AB 1934 would require the State Fire Marshal's Wildfire Mitigation Advisory Committee to develop a home hardening certification program by January 1, 2028. The certification program would identify home hardening measures, including defensible space, that can be voluntarily implemented during renovation and/or property improvement projects to substantially reduce the risk of loss during a fire and bring existing building stock into alignment with state building standards for wildland-urban interface (WUI) areas.

California local governments support the establishment of a statewide home hardening certification program because it would provide a clear, science-based standard for reducing wildfire risk to existing homes, strengthening community resilience while helping residents make informed investments in safety. A uniform certification would also improve eligibility for insurance incentives; however, property-level and communitywide wildfire risk mitigation efforts still need to be accounted for in insurance rates and formalized in an update to the Safer from Wildfires regulations. By lowering structure loss during wildfires, home hardening ultimately protects lives and reduces the long-term public costs of disaster response and recovery.

For these reasons, we are pleased to support AB 1934. Should you have any questions regarding our position, please do not hesitate to contact Jordan Wells (CSAC) at jwells@counties.org, Jolena Voorhis (Cal Cities) at jvoorhis@calcities.org, or Staci Heaton (RCRC) at sheaton@rcrcnet.org.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

Jolena Voorhis
Legislative Advocate
League of California Cities

Staci Heaton
Senior Policy Advocate
Rural County Representatives of California

CC: The Honorable Steve Bennett, Member of the California State Assembly
Members, Assembly Emergency Management Committee

March 17, 2026

The Honorable Jacqui Irwin
Member, California State Assembly
1021 O Street, Room 6220
Sacramento, CA 95814

RE: **AB 1938 (Irwin): Coastal recreation: designated state surfing reserves.**
Notice of SUPPORT IF AMENDED *(As Introduced February 13, 2026)*

Dear Assemblymember Irwin,

On behalf of the League of California Cities (Cal Cities) and the California State Association of Counties (CSAC), we write to express our **Support If Amended** position on AB 1938 (Irwin), related to designated surfing reserves along California's coastline. While our organizations work on behalf of cities and counties statewide, we engage closely with the 76 coastal cities and counties on issues facing California's unique and precious coast.

AB 1938 would propose that the Ocean Protection Council (OPC) establish criteria and an application process on or before July 1, 2027 for the purpose of designating state surfing reserves along California's coast. The bill would authorize the OPC that when establishing the criteria, they shall consider wave features, surf zones and surrounding environments, surf culture, history, and environmental characteristics, as well as allow the OPC to require one of the criteria to be a letter of recommendation from the California Coastal Commission. The bill would authorize a local government to apply to the OPC after adopting a formal resolution to designate a surfing reserve and OPC would be required to approve the application from the local government if they meet the criteria.

Preserving the integrity and unique culture of California's coast is highly valued among coastal jurisdictions. We are supportive of AB 1938's intent and are seeking a clarifying amendment to ensure that this state surf reserve designating process will be used by local governments:

1) Many coastal jurisdictions already have informally identified surf areas. We believe a public process as the OPC develops the criteria would be helpful, so local governments and other stakeholders can provide public comments on the draft criteria before they are finalized for designating surf reserves. This would help ensure considerations of existing surf areas are factored into the statewide criteria and doesn't preclude these areas from qualifying. Public processes often include at a minimum a 30-day public comment period, opportunity for written public comment, and a public workshop for interested parties to engage. Additionally, some jurisdictions have existing surf areas located or accessible via state lands, like State Parks. We believe a public process prior to the development of the criteria would allow local governments to share this type of information with the OPC and to allow for criteria that promotes meaningful partnerships between the state and local governments in designating surf reserves.

For these reasons, we have a **Support If Amended** position on AB 1938 (Irwin). If you have any questions, please contact Melissa Sparks-Kranz at msparkskranz@calcities.org or Jordan Wells at jwells@counties.org.

Sincerely,

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

Jordan Wells
Legislative Advocate
California State Association of Counties

March 17, 2026

The Honorable Diane Papan
Chair, Assembly Committee on Water, Parks, and Wildlife
Capitol Office, Room 4220
Sacramento, CA 95814

RE: AB 2218 (Kalra) – OPPOSE UNLESS AMENDED

Dear Chair Papan:

On behalf of the Association of California Water Agencies (ACWA) and the undersigned organizations, I am writing to respectfully express our "Oppose Unless Amended" position on AB 2218, relating to historic inequities perpetuated by state-sanctioned actions against California Native American tribes.

Our organizations recognize the author's intent of acknowledging and correcting for past harms inflicted on tribes. However, the provisions in AB 2218 are ambiguous with potentially significant, far-reaching implications for all water management actions throughout the state. We believe AB 2218 must be amended in a way that preserves the intent of the bill and minimizes the uncertainty for state and local agencies, existing water right holders, project proponents, and others. As currently written, it is unclear why the language proposed in AB 2218 is included in the Water Code; the bill introduces broad, vague language that would result in significant legal uncertainty; does not acknowledge existing statewide and local efforts to promote tribal engagement; and lacks guardrails necessary for preventing the creation of unfunded mandates. Our primary concerns are summarized below:

1. Addressing Historical Inequities in the Water Code

This bill would establish within the Water Code a state policy to "acknowledge *and* correct" inequities caused by state-sanctioned acts against California Native American tribes. All relevant state agencies, including the State Water Resources Control Board (State Water Board) and Department of Water Resources (DWR), would be required to "consider *and* incorporate" this policy when revising, adopting, or establishing rights, policies, regulations, permits, or grant criteria. All relevant state agencies would need to operate under this policy without clear direction or guidelines of when to appropriately apply this policy. Clear expectations need to be established to determine when an action has been successfully corrected and to identify the entity responsible for making that determination.

The provisions of this bill attempt to model the California's Human Right to Water law (HRWL), which requires state agencies, including the State Water Board, to "consider" the human right to water when "revising, adopting, or establishing policies, regulations, and grant criteria." Under the HRWL, the only action required of state agencies is *consideration* in decision-making processes, whereas AB 2218 would require state agencies to incorporate undefined remedies in every state water management action, including compensation, legal recognition of rights, and replacing benefits lost. The HRWL affects how the State Water Board allocates funding and

resources and influences the policies and programs that it pursues in its regulatory capacity. It is reasonable to conclude that implementation of AB 2218 would provide for a more complicated and legally challenging implementation compared to that of the HRWL. Correcting past inequities should not be the role of a single state agency, let alone integrated into regulatory processes; addressing past inequities through compensation and corrections cannot be feasibly implemented by state agencies in active regulatory proceedings. Acknowledgment of such inequities would be more appropriately suited for the Legislature. **If the language remains in the Water Code, we ask that it specifies that the bill is specific to the State Water Board and DWR and to list the other relevant agencies that the author intends to capture.**

2. Presents Broad, Vague Language that Would Result in Significant Legal Uncertainty
AB 2218 lacks the definitional guardrails necessary for consistent, legally defensible implementation. As written, the bill's mandate that all relevant state agencies "consider and incorporate" a policy of correcting historical inequities — through compensation, legal recognition of rights, or replacement of benefits lost — could subject virtually every regulatory, permitting, and grant action to new legal challenges without providing agencies, applicants, or affected parties any meaningful standard for compliance.

The bill does not define who bears responsibility for compensation, what constitutes a "benefit lost," or what process agencies must follow to identify and address inequities. This absence of definition creates compounding uncertainty: agencies cannot know when they have satisfied the mandate, project proponents cannot assess their exposure, and courts would have no statutory standard against which to evaluate agency action. The result would likely be increased litigation across a wide range of water management proceedings, not because the bill's goals are unreasonable, but because its implementation pathway is undefined.

For example, under AB 2218, the California Department of Fish and Wildlife (CDFW) could impose new conditions of approval on a California Endangered Species Act incidental take permit requiring permittees to compensate tribal governments as deemed appropriate by CDFW. This bill, as written, lacks definitions, expectations, and guardrails for how this bill would be implemented, including not identifying adequate funding sources to compensate tribes to meet this mandate.

The bill would impose compensatory mandates without recognizing existing tribal consultation and engagement efforts. One key example is the update of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Watershed (Bay-Delta Plan), which has been underway for over a decade and included tribal consultation. The State Water Board has incorporated designated tribal beneficial uses into the Bay-Delta Plan update, which requires water users to provide reasonable protection of those beneficial uses. AB 2218 could disrupt these existing processes and potentially result in increased costs and litigation, thereby delaying important water planning efforts.

3. Fails to Align with the State Water Board's Existing Racial Equity Framework
The author states that AB 2218 is necessary to provide statutory backing to existing state agency efforts to address historical injustices, including the State Water Board's Racial Equity Resolution (Resolution). However, the remedies specified in AB 2218 do not reflect those articulated in the Resolution. The State Water Board's Resolution advances tribal equity through improved consultation, government-to-government engagement, and equitable access to safe, clean

drinking water. It does not direct agencies to provide compensation or recognize new legal rights through administrative proceedings.

4. **The Bill Overlooks Existing Statewide Efforts and does not clearly identify Barriers**
In the last decade, the state has increasingly memorialized the importance of acknowledging the historical inequities faced by California Native American tribes. Multiple Executive Orders and state agency policies have been drafted to incorporate tribal input. Most recently, as a result of SB 72, (Chapter 210, Statutes of 2025), DWR is now forming a tribal advisory committee to ensure inclusion of Tribal perspectives in the update to the California Water Plan (CWP). In the latest iteration of the CWP, the document recognizes the inherent worth of California tribes and their deep connection with water and emphasized the need for California water management planning to incorporate values and strategies to combat climate change. Within the CWP, there are specified recommendations to advance equitable outcomes in water management including "collaborating with Tribes to incorporate indigenous knowledge into water policy planning."

AB 2218 imposes complex and legally challenging mandates but does not identify examples of challenges encountered with implementing existing tribal consultation and engagement policies. A more productive solution to achieve the intent of the bill is to build upon existing efforts to engage tribes in the management of water in the face of climate change without infringing on the ability to provide safe and reliable water. **To advance the state's efforts, we recommend building off inclusive approaches identified in the state's existing equity and tribal consultation plans.**

5. Lacking Legal Guardrails
It is unclear how exactly an agency would be expected to implement this policy. Without clear standards, guardrails, or limits, this bill could expose state agencies and permit applicants to an increase in litigation, project delay, and financial challenges. Unlike the HRWL, this bill would not include protections on the potential creations of new obligations to provide water or prevent the potential infringement of rights and responsibilities on others.

To address the concerns described above, we respectfully request that the author amend AB 2218 to replace the current remedial framework — compensation, legal recognition of rights, and replacement of benefits lost — with language that reflects the State Water Board's Resolution, including improved consultation, meaningful government-to-government engagement, and access to safe, clean drinking water. We further request the addition of definitional provisions that identify which agencies are subject to the mandate, the process that agencies must follow to identify inequities, and an explicit savings clause confirming that nothing in the bill modifies, impairs, or supersedes any existing water right, permit, or license issued under the Water Code. Finally, we request the inclusion of language explicitly stating that nothing in this bill would create new causes of action or incur additional responsibility to legal users of water or any public water system.

While our organizations support efforts to improve tribal engagement in water management decision making, AB 2218 is broadly written with vague terminology that would have devastating impacts to critical water supply planning and regulatory decisions and pose significant legal challenges. Our organizations respectfully oppose AB 2218 unless it is amended to address these concerns. See below for our proposed amendments. If you have any questions about our position, please contact Amber Rossow at AmberR@acwa.com.

Sincerely,

Amber Rossow
Policy Advocate
Association of California Water Agencies

Kristopher M. Anderson
Policy Advocate
California Chamber of Commerce

Charles Delgado
Legislative Advocate
California State Association of Counties

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

AB 2218 (Kalra) Proposed Amendments for Consideration

Section 106.2

(a) It is hereby declared to be the established policy of the state to acknowledge ~~and correct~~ the inequities caused by state-sanctioned acts of termination, removal, and assimilation inflicted upon all California Native American tribes through ~~compensation~~ improved tribal consultation, ~~legal recognition of rights~~, ~~and~~ access to safe, clean, drinking water, and treating tribal governments with respect when it comes to water management planning.

(b) ~~All relevant state agencies, including~~ The department and the state board, shall consider ~~and incorporate~~ this policy when revising, adopting, or establishing rights, policies, regulations, permits, or grant criteria ~~to address identified inequities~~. In doing so, the department and the state board shall seek input and consultation with California Native American tribes on rules, regulations, policies, and programs affecting water resources.

Nothing in this section shall be construed to modify, impair, or supersede any existing water right, permit, license issued, or entitlement of water pursuant to this code, or to create any new cause of action against any water right holder. The identification of inequities under this section shall be conducted through a process of meaningful government-to-government consultation between the state and California Native American tribes.

(d) The implementation of this section shall not infringe on the rights, priority, or responsibilities of any legal user of water or any public water system.

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

March 18, 2026

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

RE: SB 1180 (Allen) Plastic Pollution Prevention and Packaging Producer Responsibility Act: California Plastic Pollution Mitigation Fund
As introduced on February 18, 2026 – SUPPORT
To be heard in the Senate Environmental Quality Committee on April 8, 2026

Dear Chair Blakespear,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we write in support of Senate Bill 1180 (Allen) related to California's Plastic Pollution Mitigation Fund.

Senate Bill 54 (Allen, 2022) is a landmark Extended Producer Responsibility (EPR) law that fundamentally reshapes how California addresses plastic pollution by requiring producers to reduce single-use packaging, ensure materials are recyclable or compostable, and finance the full lifecycle management of their products rather than shifting costs to local governments and taxpayers. The measure also created the Plastic Pollution Mitigation Fund to provide $500 million annually for ten years, paid for by plastic resin manufacturers, to address the environmental, public health, and ecological harms caused by plastic pollution.

SB 1180 would expand the definition of eligible fund recipients beyond those listed in SB 54 to include public agencies, nonprofit organizations, special districts, joint powers authorities, public utilities, local publicly owned utilities, and mutual water companies. The bill would further improve the effective deployment of these funds by mandating implementing agencies to provide technical assistance, use standardized simplified grant applications, initiate projects in a timely manner, provide advance payment, and reimburse grantees' indirect costs. SB 1180 would also require each expenditure from the fund to achieve specific purposes, including improving public or environmental health and engaging relevant communities in project planning, development, and implementation, and would establish reporting and transparency measures.

CSAC Officers

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

For these reasons, we are pleased to support SB 1180. 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

CC: The Honorable Ben Allen, Member of the California State Senate
Members, Senate Environmental Quality Committee

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

March 12, 2026

Tyler Sadwith
Chief Deputy Director & State Medicaid Director
Department of Health Care Services
1501 Capitol Avenue
Sacramento, CA 95814

Submitted via email: 1115waiver@dhcs.ca.gov

RE: CalAIM Section 1115 Demonstration Renewal Application

Dear Mr. Sadwith,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I am writing to share feedback on the state's CalAIM Section 1115 Demonstration Renewal Application. The current demonstration has created opportunities for counties and other entities to provide enhanced and tailored services to meet the health care needs of our state's diverse population.

CSAC has comments on several of the new and continued elements included in the renewal application.

- **Justice Involved Initiative** – CSAC supports this initiative that has provided meaningful opportunities to serve justice-involved individuals pre- and post-release. Continuing this initiative, and specifically the 90-day pre-release in-reach period, will allow for further efforts to improve health outcomes, enhance coordination, and reduce recidivism for this population.
- **Global Payment Program (GPP)** – CSAC supports this important tool that public hospitals utilize to provide value-based care to uninsured patients. Renewing the GPP will allow for continued opportunities to provide preventative and specialty care for those without insurance during a time when that population may significantly increase due to other changes in the Medicaid program.
- **DMC-ODS: Waiver** – CSAC supports the continuation of this waiver that transformed how substance use disorder (SUD) treatment was covered and addressed iniquities created by the federal Institutions for Mental Diseases (IMD)

CSAC Officers

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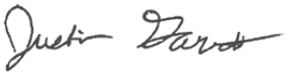
Graham Knaus

exclusion. Renewing this waiver will allow for stability for treatment providers and maintained access to SUD treatment across the behavioral health continuum of care.

- **Out-of-State Former Foster Care Youth Coverage** – CSAC supports the extension of Medi-Cal coverage for former foster youth up to age 26 who are from out-of-state. The transition years from foster care to adulthood are a critical time and stable health and behavioral health coverage during those years is essential to improving health, well-being, and stability.
- **Employment Supports** – CSAC supports this new initiative that would allow counties to assist individuals in finding opportunities to meet the new work and community engagement requirements. Counties are well positioned to coordinate and provide these supports but also face significant safety net program fiscal challenges. As this proposal is further developed, it would be helpful to get clarity on who may serve as providers and what sources can be used for the non-federal match. Counties would also appreciate flexibility of local program design and delivery and the ability to serve applicants who also must meet the new requirements.
- **BridgeCare Pilot** – CSAC appreciates the opportunities provided by this new initiative to provide comprehensive services to the population known as "near duals." As this proposal is further developed, it would be helpful to get clarity on who may serve as providers and what sources can be used for the non-federal match. In addition, CSAC wants to highlight the need for upfront investments in advance of the state reinvesting savings given the safety net fiscal challenges facing counties.
- **PATH Initiative** – CSAC encourages DHCS to identify alternative resources that could be utilized to meet the aims of the Providing Access and Transforming Health (PATH) initiative that is proposed to sunset. This will allow the important collaboration and coordination work that occurred under this initiative to continue.

Thank you for the opportunity to submit comments. Counties appreciate DHCS's leadership and partnership in supporting innovative ways to meet the health care needs of our state's Medi-Cal population.

Sincerely,



Justin Garrett
Senior Legislative Advocate

March 11, 2026
The Honorable Tina McKinnor
Chair, Assembly Public Employment
and Retirement Committee
1020 N Street, Room 153
Sacramento, CA 95814

RE: **AB 1564 (Ahrens) Employer-Employee Relations Confidential Communications.**
OPPOSE *(As Amended February 25, 2026)*

Dear Chair McKinnor,

The California Special Districts Association (CSDA), League of California Cities (Cal Cities), California State Association of Counties (CSAC), 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 Association of School Business Officials (CASBO), the California Association of Recreation and Park Districts (CARPD), Small School Districts' Association (SSDA), and the University of California, write in respectful opposition to Assembly Bill (AB) 1564. 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 Unsuccessful Legislation and Previous Veto
Our concerns with AB 1564 are consistent with the issues raised in response to previously introduced legislation, AB 340 (Ahrens, 2025), AB 1109 (Kalra, 2025), AB 2421 (Low, 2024), AB 418 (Kalra, 2019), AB 3121 (Kalra, 2018), and AB 729 (Hernandez, 2013). 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 1564 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 1564 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 1564 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 1564 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 1564 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 1564 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 1564 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 1564 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 1564 will create a problematic scenario wherein a TRO may be obtained but an employer could not fully investigate the underlying facts. AB 1564 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 that are manifesting 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 1564, 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 1564'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 1564 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 1564. 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
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Sarah Dukett
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Tyler Aguilar
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State Governmental Relations
University of California,
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Tyler.Aguilar@ucop.edu

CC:

The Honorable Patrick Ahrens
Honorable Members, Assembly Public Employment and Retirement Committee
Michael Bolden, Chief Consultant,
Assembly Public Employment and Retirement Committee
Suzanne Sutton, Director, Assembly Republican Caucus

March 11, 2026
The Honorable Patrick Ahrens
California State Assembly
State Capitol, Suite 6110
Sacramento, CA 95814

RE: **AB 1564 (Ahrens) Employer-Employee Relations Confidential Communications.**
OPPOSE *(As Amended February 25, 2026)*

Dear Assembly Member Ahrens,

The California Special Districts Association (CSDA), League of California Cities (Cal Cities), California State Association of Counties (CSAC), 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 Association of School Business Officials (CASBO), the California Association of Recreation and Park Districts (CARPD), Small School Districts' Association (SSDA), and the University of California, write in respectful opposition to your Assembly Bill (AB) 1564. 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.

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Our concerns with AB 1564 are consistent with the issues raised in response to previously introduced legislation, AB 340 (Ahrens, 2025), AB 1109 (Kalra, 2025), AB 2421 (Low, 2024), AB 418 (Kalra, 2019), AB 3121 (Kalra, 2018), and AB 729 (Hernandez, 2013). 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 1564 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 1564 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 1564 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.

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Endangers Workplace Safety
AB 1564 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 1564 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 1564 will create a problematic scenario wherein a TRO may be obtained but an employer could not fully investigate the underlying facts. AB 1564 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 that are manifesting 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 1564, 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 1564'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 1564 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 1564. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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March 11, 2026

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

Re: **AB 1883 (Bryan): Workplace surveillance tools.**
As introduced February 12, 2026 – OPPOSE
To be heard in Assembly Committee on Labor and Employment March 18, 2026

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), League of California Cities (Cal Cities), and the Association of California Healthcare Districts (ACHD), we write in respectful opposition to AB 1883 (Bryan), which could 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.

We have fundamental concerns with this and other bills that aim to restrict how public agencies can use the tools defined as "workplace surveillance tools," which we believe are essential and, in many cases, routine tools used for security.

- We oppose any legislation that will compromise health, safety, and security for our employees, the public we serve, and our officials.
- We oppose any legislation that compromises our ability to conduct investigations into fraud, waste, or abuse.
- We do not believe it is appropriate to regulate tools used for security and basic operations in response to private sector labor concerns. State law has protected the right of public employees to bargain and public employees have a property interest in their position that is protected by due process[1].

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

AB 1883 would impose several rules on how public agencies may use surveillance tools – a term that is vast in its application, including video cameras, ID badge or key fob access, digital workplace messaging collaboration platforms (e.g. Microsoft Teams or Slack), and a wide array of tools used to keep workplaces safe, conduct essential government services, and protect against abuse, fraud, and waste of public resources.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life, particularly as new technologies emerge. However, we are concerned that this bill and others aimed at limiting employer surveillance are too broad, too expensive, and too dangerous for public agencies and those we serve.

Could prohibit routine security or public health tools

It is unclear how a court could interpret the meaning of this bill. While we understand and sympathize with the concerns this bill intends to address, our concern is that a reasonable interpretation could blanketly prohibit routine tools used for security, operations, or public health.

Routine security tools like security cameras, key fobs, ID badges, digital workplace collaboration platforms (e.g. Teams or Slack), or GPS trackers passively collect worker data, including when they are actively working at a computer or cell phone or where they are at a given point in a day. Section 1581(a)(1)(B) **prohibits** any tool that identifies or infers information about workers engaging in activity protected by state or federal law.

We believe it is critical to protect the civil and labor rights of the public workforce. Our concern is that an overbroad interpretation of what it means to "identify," or "infer," worker information could endanger essential tools that, while not *designed* or *used* to intentionally undermine the rights of employees, may passively collect information that happens to meet the law's threshold for an outright ban on their use.

While some technologies identified in the bill conjure images from science fiction, we are concerned that their breadth could sweep in routine or innocuous technologies and have other unforeseen operational or safety consequences for public agencies.

Inappropriately applies to public agencies
The sponsors are advancing this bill, in part, to address activities by employers that undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union organizing and bargaining 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.

Exposes public agencies to severe litigation risk and steep penalties
AB 1883 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague, sweeping, and littered with unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per employee for each violation. The County of Los Angeles employs over 100,000. A single violation to the county would cost upwards of $50,000,000.

Put simply, existing law already protects the civil and labor rights of the public workforce. We are concerned this bill could have unintended consequences that limit or prohibit essential tools used to keep employees and the public safe and thriving.

For these reasons, we are firmly **opposed** to AB 1883 and urge your "NO" vote.

Sincerely,

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Aaron Avery
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Johnnie Piña
Legislative Advocate
League of California Cities
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CC: The Honorable Isaac Bryan, Member, California State Assembly
Members and Consultants, Assembly Committee on Labor and Employment
Megan Lane, Chief Consultant, Assembly Committee on Labor and Employment
Rose Rastbaf, Policy Consultant, Assembly Republican Caucus

March 11, 2026

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

Re: **AB 1898 (Schultz): Workplace artificial intelligence tools.**
As introduced February 12, 2026 – OPPOSE
To be heard in Assembly Committee on Labor and Employment March 18, 2026

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), League of California Cities (CalCities), and the Association of California Healthcare Districts (ACHD), we write in respectful opposition to AB 1883 (Schultz), 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.

We have fundamental concerns with this and other bills that aim to restrict how public agencies can use tools which we believe are essential and, in many cases, routine tools used for security.

- We oppose any legislation that will compromise health, safety, and security for our employees, the public we serve, and our officials.
- We oppose any legislation that compromises our ability to conduct investigations into fraud, waste, or abuse.
- We do not believe it is appropriate to regulate tools used for security and basic operations in response to private sector labor concerns. State law has protected the right of public employees to bargain and public employees have a property interest in their position that is protected by due process[1].

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

AB 1898 would impose several rules on how public agencies may use surveillance tools – a term that is vast in its application, including video cameras, ID badge or key fob access, workplace messaging applications (e.g. Microsoft Teams or Slack), and a wide array of tools used to keep workplaces safe, conduct essential government services, and protect against abuse, fraud, and waste of public resources.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life, particularly as new technologies emerge. However, this bill and others aimed at limiting employers' use of critical technology are too broad, too expensive, and too dangerous for public agencies and those we serve.

Allows veto of security tool by single employee or contractor

AB 1898 would require public agencies to provide a written notice that a workplace AI/ADS tool was used to assist the employer in making employment-related decisions or to surveil the workplace. They must notify employees, exclusive representatives, and independent contractors, likely to be directly or indirectly affected, at least 90 days before introducing a workplace AI tool, which includes both a workplace surveillance tool and an automated decision system, and notify new employees and contractors upon hire, or within a month after the bill takes effect for tools already used in the workplace. The bill then requires notice to all employees and independent contractors at least once annually.

The notice must contain, among other things, detailed information on the workplace surveillance tool or automated decision system justification, uses, worker data information including description, collection, storage, access, and uses, detailed technical and other information about the workplace surveillance tool or automated decision system, a description of the general locations and the specific activities, communications, and job roles that will be surveilled and the technologies that will be used, quota information, training information, and information about whether any jobs or job tasks will be replaced or automated by the technology.

Proposed Labor Code § 1601(c) allows a single employee or independent contractor to veto the use of tools used for essential security, operational, or office functions, including security cameras or work email. The bill not only requires notice to employees, but this section **prohibits the use** of AI/ADS or a "workplace

surveillance tool," **until workers sign and return a notice**. This provision alone raises profound concerns for the security and operations of public agencies and the public at large. A single individual could, intentionally or not, prevent a school from using emergency alerts, turn off security cameras at an election facility, or allow police officers to stop using body cameras.

It also raises significant concerns regarding the labor rights of the public workforce, as a single independent contractor could overrule the decisions of the public workforce for an agency, even if the use of certain tools has been bargained in an MOU. This raises significant concerns regarding the rights of public employees and could place public agencies with the choice of violating MOUs and the Meyers-Milias-Brown Act or facing the steep penalties that would be imposed through this bill.

Endangers public resources

Section 1601(f) requires public agencies to notify employees about how a surveillance tool is used, including the purpose of a surveillance tool, the make and model of the tool to be used, the job roles to be monitored, the locations where they will be monitored, which technologies will be used, and how often they will be used. Many of these requirements will frustrate routine uses of technology and undercut public agencies' efforts to secure their facilities, public data, finances, and protect employees and the public alike.

Undermines fraud and abuse prevention and investigation

Public agencies are responsible for delivering essential public services and protecting against fraud, waste, and abuse of public resources. Imagine a public agency is concerned that an employee is committing fraud by creating a shell company and signing false invoices used to pay for lavish gifts and cash[2]. Under section 1601(f)(6), the agency would be required to inform the employee about what tools they are using to investigate them, inform them about job roles they are monitoring, which technologies will be used, and why they are using them. Put simply, AB 1898 could make the fraudster aware that they are being investigated, how they are being investigated, and why they are being investigated.

These same concerns apply to necessary efforts by public agencies to investigate claims of abuse of minors, excessive force, workplace violence, stalking, harassment, threats to public officials, or corruption.

[2] https://www.justice.gov/usao-edca/pr/former-state-employee-sentenced-over-5-years-prison-2m-scheme-defraud-office-aids

Exposes government agencies to physical and cybersecurity risks
Section 1601(f)(7) would require public agencies to include the specific make and model of each AI/ADS and workplace surveillance tool. Disclosure of this information, along with the requirements to report the locations, could provide a material advantage to bad actors seeking to exploit vulnerabilities or gaps in security 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 providing behavioral health services and shelters for the unhoused.

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, and benefits officers, among myriad other examples.

Reporting and publication of the detailed information required by AB 1898 could set back public employers' efforts to protect employees and the public.

Inappropriately applies to public agencies
The sponsors are advancing this bill, in part, to address activities by employers that undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union organizing and bargaining 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.

Exposes public agencies to severe litigation risk and steep penalties
AB 1898 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague, sweeping, and littered with unintended consequences. In addition to punitive damages and attorney fees, this

bill could cause public agencies to incur staggering penalties of $500 per employee for each violation. The County of Los Angeles employs over 100,000. A single violation to the county would cost upwards of $50,000,000.

Put simply, public agencies use the tools restricted by this bill to protect public resources, not to influence employee organization activities. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1898 and urge your "NO" vote.

Sincerely,

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

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

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Aaron Avery
Director of State Legislative Affairs
California Special Districts Association
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Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

CC: The Honorable Nick Schultz, Member, California State Assembly
Members and Consultants, Assembly Committee on Labor and Employment

Megan Lane, Chief Consultant, Assembly Committee on Labor and Employment
Rose Rastbaf, Policy Consultant, Assembly Republican Caucus

March 11, 2026

The Honorable Maria Elena Durazo
California State Capitol, Room 407
Sacramento, CA 95814

RE: **SB 922 (Laird) Vehicles: local agency charges: use of streets or highways.**
COALITION SUPPORT *(As Amended on March 11, 2026)*

Dear Chair Durazo,

The undersigned coalition of local governments and service providers respectfully supports SB 922, which would clarify and reaffirm long-standing practices related to recovering the cost of street maintenance and repair associated with providing essential public services.

Local streets and roads are critical infrastructure that support daily community needs across California. Essential public services, including garbage, recycling, and green waste collection, rely on the regular and frequent use of local streets by heavy service vehicles. These vehicles are vital to protecting public health and environmental quality, and their routine operation necessarily contributes to pavement wear and roadway deterioration over time.

For decades, local governments and service providers, including waste haulers, have worked collaboratively under established rates, fees, and franchise agreements to account for these impacts as part of delivering essential services. These arrangements are familiar, transparent, and predictable, and they allow service providers to operate efficiently while ensuring that local streets remain safe and functional for the communities they serve.

Recently, a court decision created uncertainty around these long-standing practices. As a result, existing service-related cost recovery mechanisms are being challenged, placing street maintenance funding at risk and creating uncertainty for both local governments and the service providers that rely on well-maintained roads to deliver essential services.

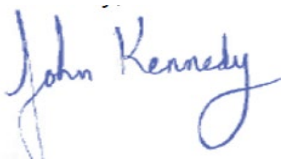
SB 922 would address this uncertainty by clarifying that restrictions on local road charges apply only to weight-based charges imposed for the privilege of using streets or highways. The bill further makes clear that fees associated with providing public services may continue to include recovery of street maintenance and repair costs related to those services. By reaffirming existing practices, SB 922 would restore clarity, reduce unnecessary litigation, and provide greater certainty for local agencies and service providers alike.

For these reasons, the undersigned coalition respectfully supports SB 922 (Laird) and respectfully requests an "AYE" vote when the bill is heard in committee.

If you have any questions, please contact the coalition representatives listed below.

Sincerely,

Ben Triffo
League of California Cities
Legislative Advocate
btriffo@calcities.org



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Julia Mangin
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Director of Government Affairs & Sustainability
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March 12, 2026

The Honorable Maria Elena Durazo
Chair, Senate Local Government Committee
State Capitol, Rm 407
Sacramento, CA 95814

RE: Senate Bill 1005 – Support
As Introduced February 9, 2026

Dear Senator Durazo:

On behalf of the Rural County Representatives of California, the California Association of County Treasurers and Tax Collectors (CACTTC), the League of California Cities (Cal Cities), the California State Association of Counties (CSAC), and the California Special Districts Association (CSDA), we are pleased to support Senate Bill 1005 (Caballero), the PENNIES Act, which provides much needed clarity to public agencies following the end of penny production by the federal government.

Following federal action to discontinue penny production, local agencies require statutory authority to manage the resulting operational impacts from eliminating the coin from the currency stream. On February 9, 2025, President Trump ordered the Treasury Secretary, Scott Bessent, to stop producing new pennies at the U.S. Mint. The last penny produced for general circulation was minted at the U.S. Mint in Philadelphia on November 12, 2025. The US Treasury states the decision was influenced by the rising cost of producing the penny, which has increased from 1.42 cents to 3.69 cents per penny.

Beginning in October 2025, local agency treasurers were notified by their commercial banks that, once existing penny supplies are exhausted, banks will no longer be able to fulfill penny orders for public agency clients. As a result, local agencies will be unable to consistently provide exact change to taxpayers and residents who prefer to make their payments to government agencies in cash.

Current statute does not account for the elimination of the penny and does not authorize public agencies to round cash payments to the nearest five cents. SB 1005 provides this critical relief to local agencies that must accept cash payments. This measure does not change any payment options available to those making their payments to public agencies; it simply reflects a new reality in how local agencies will conduct cash payments due to changes at the Federal level. This is a vital piece of public policy that will be urgently needed as the availability of the US Penny rapidly diminishes in the coming months.

For these reasons, we are pleased to support SB 1005 and respectfully request your "aye" vote when this measure is heard before your committee. Please do not hesitate to contact us if you have any questions.

Sincerely,

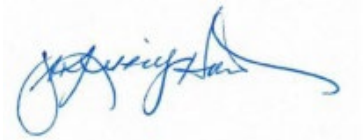
SARAH DUKETT
Rural County Representatives of California
Senior Policy Advocate
sdukett@rcrcnet.org

KAREN LANGE
California Association of County Treasurers
and Tax Collectors
Legislative Advocate
karen@syaslpartners.com

EMMA JUNGWIRTH
California State Association of Counties
Senior Legislative Advocate
ejungwirth@counties.org

AARON AVERY
California Special Districts Association
Director of State Legislative Affairs
aarona@csda.net

BEN TRIFFO
League of California Cities
Legislative Advocate
btriffo@calcities.org



JEAN HURST
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

cc: The Honorable Anna Caballero, Member of the California State Senate
Members, Senate Local Government Committee
Jonathan Peterson, Principal Consultant, Senate Local Government Committee
Ryan Eisberg, Policy Consultant, Senate Republican Caucus

March 10, 2026

The Honorable Cottie Petrie-Norris
Chair, Assembly Utilities and Energy Committee
1020 N Street, Suite 121
Sacramento, CA 95814

RE: **AB 1761 (Rogers) Electricity: calculation methodology: data disclosure.**
Notice of SUPPORT *(As Introduced on February 9, 2026)*

Dear Chair Petrie-Norris,

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), and Rural County Representatives of California (RCRC) are pleased to **support AB 1761 (Rogers)**, which would improve the transparency in how the power charge indifference adjustment (PCIA) is calculated on energy bills.

Over 220 cities and counties throughout California are actively participating in Community Choice Aggregation (CCA) to meet the state's climate action goals and provide residents and businesses with clean energy options. Communities can join together through the formation of CCAs to pool their electricity load in order to purchase clean energy and develop local efficiency projects and programs on behalf of their residents and businesses. CCAs work in partnership with the region's existing Investor-Owned Utility (IOU), which continues to deliver power and maintain the grid, while the CCA retains local autonomy to procure clean renewable energy resources.

To help ensure customers receive energy bills that are fair and accurate, AB 1761 would increase transparency in how PCIA charges are calculated. The PCIA is a fee designed to ensure customers who leave utility generation service, like customers of a CCA, pay their portion of legacy power costs. Since the PCIA was implemented, there has been no consistent standard for what data must be made available in any California Public Utilities Commission (CPUC) process or proceeding when the PCIA is set. AB 1761 would ensure that all data that is used to calculate the PCIA costs is disclosed, including cost inputs, forecasting, and assumptions, and methodologies.

Cal Cities, CSAC, and RCRC support the role of CCAs that increase local decision-making over the purchase and development of clean renewable energy resources, as an effective means of increasing consumer access to renewable energy at stable, competitive rates, and decreasing statewide greenhouse gas emissions. We support the need for transparency of energy procurement practices to supports fair competition in statewide energy markets for CCAs and to protect CCA customers from improper cost allocation.

For these reasons, our organizations **support AB 1761 (Rogers)** and respectfully requests your 'AYE' vote when the bill is heard in committee. If you have any questions, please

contact Melissa Sparks-Kranz (Cal Cities) at msparkskranz@calcities.org, Jordan Wells (CSAC) at jwells@counties.org, and John Kennedy (RCRC) at jkennedy@rcrcnet.org.

Sincerely,

Melissa Sparks-Kranz	Jordan Wells	John Kennedy
Legislative Advocate	Legislative Advocate	Senior Policy Advocate
Cal Cities	CSAC	RCRC

cc: The Honorable Assemblymember Chris Rogers
Members, Assembly Utilities and Energy Committee

March 10, 2026

The Honorable Chris Rogers
Member, California State Assembly
1021 O Street, Suite 5130
Sacramento, CA 95814

RE: **AB 1761 (Rogers) Electricity: calculation methodology: data disclosure.**
Notice of SUPPORT *(As Introduced on February 9, 2026)*

Dear Assemblymember Rogers,

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), and Rural County Representatives of California (RCRC) are pleased to **support AB 1761 (Rogers)**, which would improve the transparency in how the power charge indifference adjustment (PCIA) is calculated on energy bills.

Over 220 cities and counties throughout California are actively participating in Community Choice Aggregation (CCA) to meet the state's climate action goals and provide residents and businesses with clean energy options. Communities can join together through the formation of CCAs to pool their electricity load in order to purchase clean energy and develop local efficiency projects and programs on behalf of their residents and businesses. CCAs work in partnership with the region's existing Investor-Owned Utility (IOU), which continues to deliver power and maintain the grid, while the CCA retains local autonomy to procure clean renewable energy resources.

To help ensure customers receive energy bills that are fair and accurate, AB 1761 would increase transparency in how PCIA charges are calculated. The PCIA is a fee designed to ensure customers who leave utility generation service, like customers of a CCA or direct access customers, pay their portion of legacy power costs. Since the PCIA was implemented, there has been no consistent standard for what data must be made available in any California Public Utilities Commission (CPUC) process or proceeding when the PCIA is set. AB 1761 would ensure that all data that is used to calculate the PCIA costs is disclosed, including cost inputs, forecasting, and assumptions, and methodologies.

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For these reasons, our organizations **support AB 1761 (Rogers)** and respectfully requests your 'AYE' vote when the bill is heard in committee. If you have any questions, please

contact Melissa Sparks-Kranz (Cal Cities) at msparkskranz@calcities.org, Jordan Wells (CSAC) at jwells@counties.org, and John Kennedy (RCRC) at jkennedy@rcrcnet.org.

Sincerely,

Melissa Sparks-Kranz
Legislative Advocate
Cal Cities

Jordan Wells
Legislative Advocate
CSAC

John Kennedy
Senior Policy Advocate
RCRC

California State Association of Counties®

March 12, 2026

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The Honorable Assemblymember Isaac Bryan
Chair, Assembly Natural Resources Committee
1020 N Street, Room 164
Sacramento, CA 95814

RE: AB 2051 (Wicks): Public resources: Coastal Resilience Permitting Working Group.
As Introduced 2/18/2026 – Notice of SUPPORT

Dear Assembly Member Bryan,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of AB 2051 (Wicks).

California's coast and bays are on the front lines of climate change. Sea level rise, storm surges, and increasingly frequent flooding threaten vulnerable communities, sensitive ecosystems, and critical infrastructure across the state. The Ocean Protection Council projects sea levels could rise by more than three feet by 2100 under likely scenarios, with even higher-end projections possible. In the San Francisco Bay Area alone, agencies estimate needing $110 billion by 2050 for climate resilience projects to protect people, habitats, and public infrastructure.

Delivering these resilience projects quickly and responsibly is essential. Unfortunately, California's current coastal permitting system is often fragmented and unpredictable, slowing urgently needed adaptation efforts and increasing costs, as illustrated by the California State Assembly Select Committee on Permitting Reform's final report.

AB 2051 takes a thoughtful and collaborative approach to addressing these challenges. The bill directs the California Natural Resources Agency to convene an interagency Coastal Resilience Permitting Working Group to identify administrative improvements and develop a clear roadmap for streamlining permitting for coastal resilience projects. Through stronger interagency coordination, standardized processes, workforce assessment, and recommendations for future legislative action, the bill seeks to

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accelerate resilience projects while upholding California's environmental protections.

AB 2051 will help ensure that critical climate adaptation projects move forward at the scale and speed required to protect communities and ecosystems. For these reasons, we respectfully urge your support of AB 2051.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties
cdelgado@counties.org

CC: Members and Consultants, Assembly Natural Resources Committee
The Honorable Buffy Wicks, California State Assembly

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March 12, 2026

The Honorable Maria Elena Durazo
Chair, Senate Committee on Local Government
State Capitol, Room 407
Sacramento, CA 95814

RE: SB 910 (Seyarto): Municipal water districts: water service: Indian Lands.
As Introduced 1/26/2026 – Notice of SUPPORT

Dear Chair Durazo,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of SB 910 (Seyarto).

This bill would renew for five years the existing authority for municipal water districts to apply to their Local Agency Formation Commission (LAFCo) to provide water services to tribal lands outside of their boundaries, upon request of the affected tribe.

As recognized by state law, every human being has the right to safe, clean, affordable, and accessible water. Native American tribes face challenges above and beyond those of most other regions in securing reliable access to water, not the least of which include overlapping and complex regulations and approval processes for establishing water service. In response to this issue, AB 1361 (Garcia) was enacted in 2017 to provide an efficient pathway for tribes to request service from existing water districts. This authority was renewed by AB 2081 (Garcia, 2022).

This mechanism has been a valuable tool for tribes to secure access to water. Renewing this existing authority, which has existed for a decade with no identified unintended or negative outcomes, is a common-sense measure to help the state continue to work toward access to water for all.

For these reasons, we are proud to support SB 910 (Seyarto). If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

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Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

CC: Members and Consultants, Senate Committee on Local Government
The Honorable Kelly Seyarto, California State Senate

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March 12, 2026

The Honorable Josh Becker
Chair, Senate Committee on Natural Resources and Water
1021 O Street, Suite 3220
Sacramento, CA 95814

RE: SB 1305 (Richardson): Wildlife: bears.
As Introduced 2/20/2026 – Notice of OPPOSITION

Dear Chair Becker,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in opposition to SB 1305 (Richardson).

This bill would codify the reintroduction of the grizzly bear as state policy, and would require the California Department of Fish and Wildlife (CDFW) to develop a roadmap to effectuate that reintroduction, including scientific evaluations, cost estimates, proposed regulations, and various consultations.

CSAC generally supports efforts to protect California's natural ecosystems and species, and to restore our habitats to the maximum extent feasible. We support efforts to do so that appropriately balance the needs of communities as part of these restoration initiatives.

However, the potential reintroduction of grizzly bears to the forests of California after an absence of more than a century presents risks to residents in the future, and immediate risks to existing state regulatory efforts.

As outlined during a January 2026 informational hearing in the Assembly Water, Parks, and Wildlife Committee on human-wildlife conflict, we currently experience a number of challenges related to apex predators such as mountain lions and gray wolves (recently reintroduced to the environment). There have been increasing instances of attacks on livestock and people related to the presence of these species. And while we appreciate the efforts made by CDFW to administer programs to prevent loss of life and mitigate economic losses due to wildlife conflict, these programs are not currently funded at the required levels, and challenges remain on how to best coordinate local and state response. We would recommend more action from the Legislature and the Administration to fully identify and solve the policy questions that have arisen from the increase and reintroduction of

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apex predator species in California before another such species is intentionally added into the environment.

Additionally, CDFW is experiencing significant cutbacks in this year's budget, placing strain on existing state resources during a period of heightened unpredictability in regard to federal authorities and actions in the environmental policy space. This agency is already being asked to do more with less; placing a major new initiative on CDFW without an identified funding source jeopardizes existing, essential functions, such as permitting related to lake and streambed alterations and endangered species. This bill stands a high likelihood of unintentionally slowing down the permitting of essential projects by redirecting resources to this mandated roadmap process. More resources are already required to address the current impact of gray wolves and other species; this bill would compound these funding challenges.

For these reasons, we are opposing SB 1305 (Richardson). If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

CC: Members and Consultants, Assembly Natural Resources Committee
The Honorable Buffy Wicks, California State Assembly

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

March 4, 2026

The Honorable Alex Lee
Chair, Assembly Human Services Committee
1020 N Street, Room 122
Sacramento, CA 95814

RE: AB 1602 (B. Rubio) Foster youth: disaster aid assistance.
As Introduced January 16, 2026 – SUPPORT
Set for hearing in Assembly Human Services Committee on March 10, 2026

Dear Assemblymember Lee:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Assembly Bill 1602 by Assembly Member Blanca Rubio. This measure would establish a 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 1602 will help stabilize children and 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 1602 authorizes county child welfare departments, county probation departments, and tribes 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 1602. Should you have any questions regarding our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org. Thank you for your consideration.

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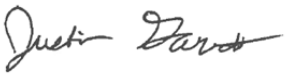
Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Blanca Rubio, Member, California State Assembly
Honorable Members and Consultants, Assembly Human Services Committee
Eric Dietz, Consultant, Assembly Republican Caucus

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

March 3, 2026

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

RE: AB 1660 (Schiavo) Public guardians and public administrators
As Introduced January 29, 2026 – SUPPORT
Set for hearing in Assembly Judiciary Committee on March 10, 2026

Dear Assemblymember Kalra:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Assembly Bill 1660 by Assembly Member Pilar Schiavo. This measure would compel financial institutions and third parties to promptly comply with lawful requests for information and property by Public Administrators (PA), Public Guardians (PG) and Public Conservators (PC), and allows courts to impose fines of no less than $1,000 when they fail to comply.

Under existing Probate Code, PAs, PGs, and PCs are granted the authority to secure property of conservatees and take control of a deceased's persons personal property, including bank accounts and safe deposit boxes. Unfortunately, it is common that banks – from large multinational institutions to small regional banks – deny or delay a Public Administrator or Public Guardian/Conservator request. Lack of compliance from financial institutions leads to unnecessary estate and guardianship complications and can worsen existing financial disputes.

AB 1660 strengthens existing Probate Code by imposing financial consequences on financial institutions for noncompliance with existing law. This measure will support efficient case management and administration for PAs, PGs, and PCs and help protect vulnerable clients from financial exploitation.

For these reasons, CSAC supports AB 1660. Should you have any questions regarding our position, please do not hesitate to contact me at bmccarthy@counties.org.

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Sincerely,

Brendan McCarthy
Senior Legislative Advocate

CC: The Honorable Pilar Schiavo, Member, California State Assembly
Honorable Members and Consultants, Assembly Judiciary Committee
Elizabeth Enea, Consultant, Assembly Republican Caucus

March 2, 2026

Senator Steven Choi
Senate District 37
1021 O Street, Room 7130
Sacramento, CA 95814

RE: SB 935 (Choi) Local agency design-build projects: authorization
As introduced – SUPPORT

Dear Senator Choi:

On behalf of the California State Association of Counties (CSAC) and the League of California Cities (CalCities), we are pleased to be in strong support of your bill, SB 935, which would allow local governments to continue the utilization of existing state law which allows them to use the Design-Build (DB) procurement process for qualifying public works projects. This bill achieves this by making the statutory authority for Design-Build (DB) permanent.

Existing statute enacts more uniform provisions authorizing most local agencies, counties included, to use the DB procurement process for specified public works projects within Public Contract Codes Sections 22160-22169, which excludes roads but includes buildings, utility improvements associated with buildings, flood control, underground utility improvements, and bridges.

The DB method is an approach to delivering public works projects in which both the design and construction of a project are procured from a single entity. Under design-build, the owner contracts with a single entity to both design and construct a project at a fixed price. Simultaneously, contractors are provided with more flexibility over project design, materials and construction methods. This promotes project design and construction innovation, which can result in higher quality, as well as cost savings. The approach also reduces the county and local agencies' risk and results in fewer litigation claims for all parties involved.

In the traditional Design-Bid-Build (DBB) method of construction procurement the design and contracting phases are sequential, with no direct collaboration process. Allowing alternative delivery methods for construction projects gives local governments the ability to make the most cost-effective and advantageous decision for a particular project.

The DB method streamlines project delivery through a single contract between the owner and the design-build team. Thus, using the DB method for more complex projects facilitates the completion and delivery of public works construction projects efficiently and cost effectively. SB 935 would allow local governments to continue with confidence by eliminating the sunset date on this authority.

It is for these reasons that CSAC, and CalCities are proud to support SB 935. Should you have any questions or concerns regarding our position, please do not hesitate to contact Mark Neuburger (CSAC) at mneuburger@counties.org, or Damon Conklin (CalCities) at dconklin@calcities.org.

Sincerely,

Mark Neuburger
California State Association of Counties

Damon Conklin
League of California Cities

CC: Ryan Eisberg and Kayla Williams, Consultants, Senate Republican Caucus

February 26, 2026

The Honorable Steve Bennett
Chair, Assembly Subcommittee No. 4 on Climate Crisis, Resources, Energy and Transportation
Capitol Office, 1021 O Street, Suite 4710
Sacramento, CA 95814

RE: Opposition — Governor's Sustainable Aviation Fuel Tax Credit Proposal

Dear Chair Bennett:

On behalf of the League of California Cities, the California State Association of Counties, and the Urban Counties of California, we regrettably must oppose the Governor's proposed budget trailer legislation to establish a new tax credit against diesel excise tax liability to incentivize the production and use of Sustainable Aviation Fuel (SAF).

While our organizations support the state's climate goals and efforts to reduce greenhouse gas emissions, this proposal would do so at the direct expense of critical transportation funding that cities and counties rely upon to maintain local streets, roads, and infrastructure.

The administration estimates the proposed credit would reduce diesel excise tax revenues by as much as $165 million annually in the near term, potentially growing to $300 million per year over time. These revenues are a core funding source for state and local transportation programs. According to the Legislative Analyst's Office (LAO), the projected annual impacts would include:

- $49 million reduction to local streets and roads funding provided directly to cities and counties;
- $70 million reduction to Caltrans' highway maintenance and rehabilitation programs, including the State Highway Operation and Protection Program; and
- $46 million reduction to the Trade Corridor Enhancement Program.

For local governments, these losses are significant. Even under the administration's initial estimates, the proposal would reduce already-limited local transportation funding by roughly one percent annually, resulting in fewer pavement rehabilitation projects, deferred safety improvements, and increased long-term maintenance costs. Should the credit expand as projected, annual losses to local streets and roads could exceed $90 million statewide.

These impacts come at a particularly challenging time. Transportation funding is already under structural pressure due to the state's continued transition toward zero-emission vehicles, which is steadily reducing fuel tax revenues. The proposed tax credit would accelerate this decline and further strain the fiscal sustainability of the transportation funding system that voters have repeatedly directed to be used for road and infrastructure purposes.

Moreover, the LAO has concluded the proposal represents a relatively costly approach to greenhouse gas reduction with uncertain environmental benefits, while also deviating from the longstanding voter-approved principle that diesel excise tax revenues should support surface transportation infrastructure.

For these reasons, we respectfully urge the Legislature to reject the Governor's proposed SAF tax credit and instead pursue climate strategies that do not undermine the already fragile funding base for local transportation systems.

Thank you for your consideration and continued partnership in supporting California's local governments and transportation infrastructure.

Sincerely,

Damon Conklin
Legislative Advocate
League of California Cities

Mark Neuburger
Legislative Advocate
California State Association of Counties

Chris Lee
Urban Counties of California

Cc: The Honorable Members, Assembly Subcommittee No. 4
Shy Forbes, Consultant, Assembly Subcommittee No. 4
John Fitzpatrick, Consultant, Assembly Republican Caucus

March 2, 2026

Mr. Ian Choudri
Chief Executive Officer
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

Re: Proposed Tax Increment Financing District

Dear Mr. Choudri:

On behalf of California's statewide organizations representing local agencies, the League of California Cities, California State Association of Counties, California Special Districts Association, Rural County Representatives of California, and Urban Counties of California, we write to express our opposition to the California High-Speed Rail Authority's proposal to establish Tax Increment Financing (TIF) districts within a one-half-mile radius of proposed station areas for the purpose of capturing property and potentially sales tax growth to fund high-speed rail construction and related commercialization activities.

While we recognize the significant financial challenges facing the High-Speed Rail project and appreciate the Authority's efforts to identify innovative funding strategies, the proposed value-capture framework raises profound legal, fiscal, and policy concerns for local governments and the communities we serve.

Constitutional and Legal Concerns

As outlined in recent policy analyses, the proposal to divert local tax increment to a state entity appears inconsistent with multiple provisions of the California Constitution. Local sales tax revenues are expressly protected for local governmental purposes, and the Legislature is prohibited from reallocating or transferring those revenues. Similarly, Proposition 1A (2004) guarantees that cities, counties, and special districts retain their constitutionally protected share of property tax allocations. Mandatory diversion of property

tax increment to a state authority that is not a constitutionally recognized taxing entity violates these protections and would almost certainly invite extensive litigation.

Equally concerning is the proposal's suggestion that the Authority could exercise regulatory influence over land within station areas. Land use authority is constitutionally reserved to cities and counties. While the state may set standards, it cannot assume direct local planning powers. Any attempt to do so would represent a significant encroachment on local governance.

Threats to Local Fiscal Stability

The proposed TIF model would divert future property tax growth—revenues that local governments rely upon to fund essential public services, including public health and safety, infrastructure maintenance, parks, housing programs, and local transportation improvements. Over the potential 45-year lifespan of a TIF district, these diversions would significantly constrain local fiscal capacity, particularly in communities already struggling with service demands and infrastructure backlogs.

Although school district property tax shares are typically excluded from existing TIF structures such as Enhanced Infrastructure Financing Districts (EIFDs) and Community Revitalization and Investment Authorities (CRIAs), the broader fiscal ecosystem is interconnected. Reduced city, county, and special district revenue capacity can indirectly affect school support services, public safety coordination, and community investment.

Departure from Established California TIF Frameworks

California's existing TIF tools—including EIFDs and CRIAs—are locally initiated, voluntary, and governed by public financing authorities with local representation. Participation by taxing entities requires affirmative consent, and project priorities are determined through locally adopted financing plans.

By contrast, the High-Speed Rail proposal contemplates a state-directed value-capture model that would override local initiation, governance, and consent principles. This represents a fundamental departure from decades of established public finance policy in California.

Risk of Overlapping Districts and Financial Conflicts

Many proposed station areas already fall within existing EIFDs, redevelopment successor areas, or other financing districts with pledged increment streams. Creating overlapping state-directed TIF districts could create significant legal conflicts, impair existing bond obligations, and undermine local economic development planning efforts.

Conclusion

California's local agencies support the vision of a modern, statewide, high-speed rail system. However, funding that system must not come at the expense of constitutionally protected local revenues, local land-use authority, or the fiscal stability of our communities. We cannot lift up communities with a project that is built upon their backs.

If additional state funding is necessary to advance this project, it should be pursued through constitutionally sound statewide mechanisms—such as voter-approved bonds or dedicated state revenue sources—rather than by diverting local tax increment or weakening local governance.

We respectfully urge the Authority to withdraw this proposal and instead engage collaboratively with local governments to identify funding strategies that consider both statewide infrastructure goals and local fiscal integrity.

Sincerely,

Carolyn Coleman
CEO and Executive Director
League of California Cities

Graham Knaus
Chief Executive Officer
California State Association of Counties

Jean Kinney Hurst
Legislative Advocate
Urban Counties

Neil McCormick
Chief Executive Officer
California Special Districts Association

Mary-Ann Warmerdam
Senior Vice President
Rural County Representatives of California

Cc: The Honorable Gavin Newsom, Governor, State of California
Members, Board of Directors, California High-Speed Rail Authority
Mark Tollefson, Chief Deputy Director, California High-Speed Rail Authority
The Honorable Monique Limón, California Senate President pro Tempore
The Honorable Robert Rivas, California Assembly Speaker
The Honorable John Laird, Chair of the Senate Budget and Fiscal Review Committee
The Honorable Jesse Gabriel, Chair of the Assembly Budget Committee

California Coalition on
CCWC Workers' Compensation

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CalChamber

CMTA
CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION

CAJPA
California Association of
Joint Powers Authorities

CA-SIG
California Alliance of Self-Insured Groups, Inc.
A California Non-Profit Mutual Benefit Corporation

CFLCA

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THE ASSOCIATED GENERAL CONTRACTORS
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AGC

American Property Casualty
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PIPS
The Protected Insurance Program for Schools
& Community Colleges Joint Powers Authority

ASSOCIATED GENERAL CONTRACTORS
CALIFORNIA
AGC

NORWALK
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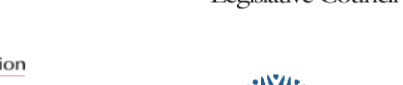
SWCLC Southwest California
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SIA
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palm desert area
chamber of commerce

March 5, 2026

The Honorable John Laird
Chair, Senate Committee on Budget & Fiscal Review
1020 N Street, Suite 502
Sacramento, CA 95814

The Honorable Jesse Gabriel
Chair, Assembly Committee on Budget
1021 O Street, Suite 8330
Sacramento, CA 95814

The Honorable Laura Richardson
Chair, Senate Budget Subcommittee No. 5 on Corrections, Public Safety, Judiciary Labor & Transportation
1020 N Street, Room 502
Sacramento, CA 95814

The Honorable Sharon Quirk-Silva
Chair, Assembly Budget Subcommittee No. 5 on State Administration
1021O Street, Suite 8230
Sacramento, CA 95814

Subject: Subsequent Injuries Benefit Trust Fund (SIBTF) Liabilities

Dear Senate and Assembly Budget Chairs,

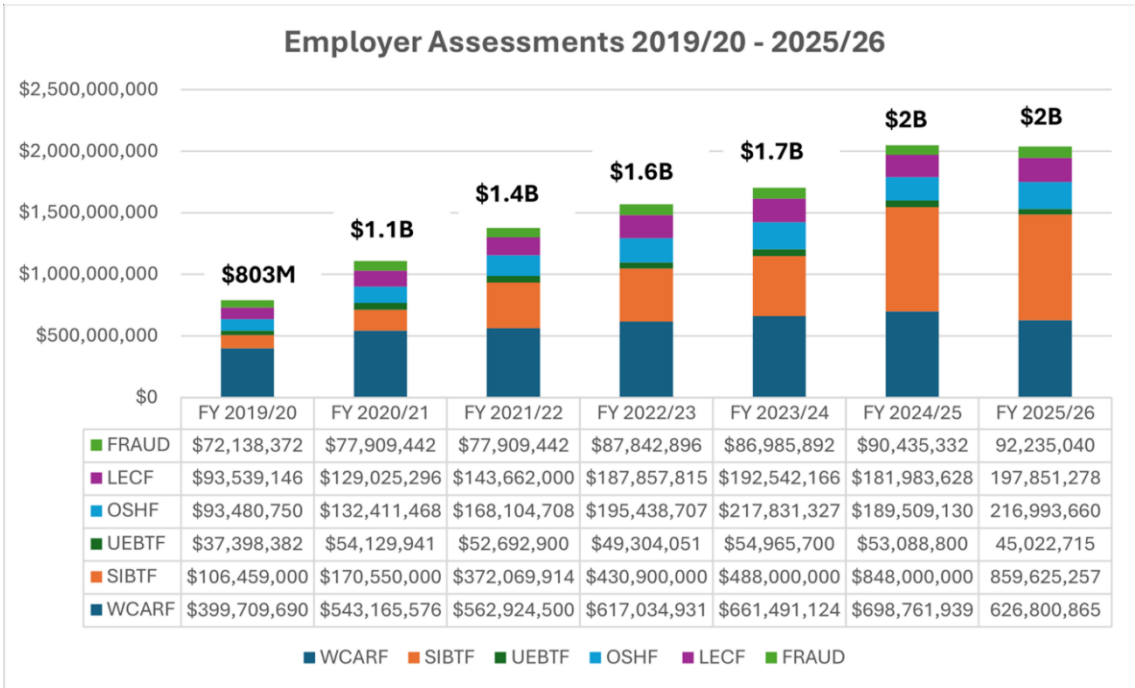
The California Chamber of Commerce and the undersigned organizations are pleased to **SUPPORT** proposed budget trailer bill language addressing the looming fiscal crisis that is California's Subsequent Injuries Benefits Trust Fund (SIBTF).

In 1945, California set up a subsequent injury fund as part of our workers' compensation system, primarily to incentivize employers to hire disabled war veterans in an era that predated state and federal fair employment laws. The intent of the special fund was to compensate workers beyond the standard benefits where their work-related disability was worsened by a pre-existing condition and, as a result, their permanent disability (PD) rating is higher than it would have been absent that pre-existing condition.

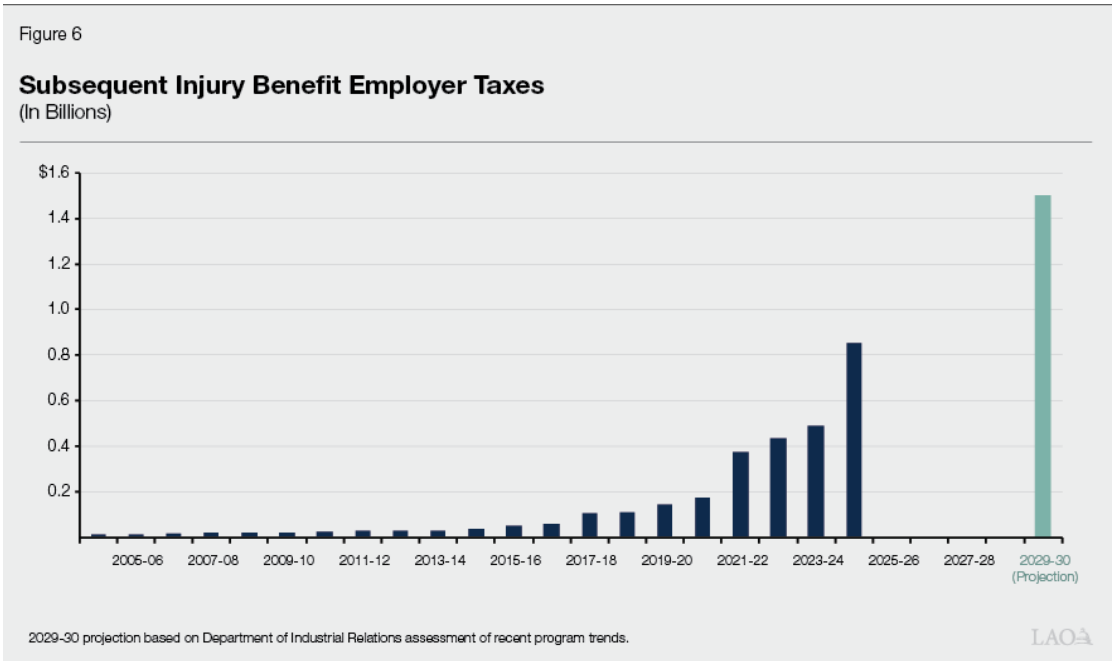
After being infrequently used for more than a half century, the volume of applicants to SIBTF has nearly tripled over the past decade. According to the Legislative Analyst's Office, "Most SIBTF claims cite common health issues as pre-existing disabilities (rather than severe conditions as originally intended)." Even so, benefits paid per claim have skyrocketed from $13,699 to $80,814. Total fund liabilities for resolved and pending cases are in the billions of dollars, with some actuarial studies estimating the cost as high as $28 billion. The continued lack of resolution regarding the SIBTF adversely affects employers, workers, and the public at large. Public and private employers bear escalating financial and administrative burdens, diverting resources from more productive uses, while workers with valid claims suffer extensive delays due to a backlog of cases that fall outside the fund's proper scope – delays that are projected to worsen significantly.

The Status Quo Will Cost the State, Local Entities, and Private Employers Billions of Dollars Each Year

SIBTF claims and their administration are funded by workers' compensation assessments paid by public and private sector employers alike, including the State of California. According to a July 2025 LAO report, both public and private employers are likely facing lifetime SIBTF costs totaling between $2 billion to $3 billion for each batch of claims that are submitted annually. The financial burden to finance this out-of-control system works as a tax on jobs because it is paid by employers as an assessment on their workers' compensation premiums. The massive expansion in cost is weighing down small and large employers alike in the private sector, and is burdening stressed state and local budgets as California struggles to backfill federal funding cuts.



	FY 2019/20	FY 2020/21	FY 2021/22	FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26
FRAUD	$72,138,372	$77,909,442	$77,909,442	$87,842,896	$86,985,892	$90,435,332	92,235,040
LECF	$93,539,146	$129,025,296	$143,662,000	$187,857,815	$192,542,166	$181,983,628	197,851,278
OSHF	$93,480,750	$132,411,468	$168,104,708	$195,438,707	$217,831,327	$189,509,130	216,993,660
UEBTF	$37,398,382	$54,129,941	$52,692,900	$49,304,051	$54,965,700	$53,088,800	45,022,715
SIBTF	$106,459,000	$170,550,000	$372,069,914	$430,900,000	$488,000,000	$848,000,000	859,625,257
WCARF	$399,709,690	$543,165,576	$562,924,500	$617,034,931	$661,491,124	$698,761,939	626,800,865



For context, the chart below displays the increases in assessments for the SIBTF alone for various public entities over the last five years:

Agency	SIBTF Tax 2020	SIBTF Tax 2025	SIBTF Tax Growth $	SIBTF Tax Growth %
County of Los Angeles	$ 2,230,743	$ 11,879,439	$ 9,648,696	433%
City of Los Angeles	$ 2,230,743	$ 6,294,331	$ 4,063,588	182%
City and county of San Francisco	$ 703,211	$ 2,531,296	$ 1,828,085	260%
PTSC-MTA Risk Management Authority	$ 470,265	$ 1,826,883	$ 1,356,618	288%
University of California	$ 501,616	$ 1,587,262	$ 1,085,646	216%
Los Angeles Unified School District	$ 628,052	$ 1,523,427	$ 895,375	143%
City of San Diego	$ 228,134	$ 1,115,515	$ 887,381	389%
San Francisco Municipal Transportation Agency	$ 292,606	$ 917,845	$ 625,239	214%
County of Riverside	$ 301,928	$ 808,162	$ 506,234	168%
County of Alameda	$ 184,433	$ 749,857	$ 565,424	307%

The Proposed Budget Language Implements Recommendations Consistent with Two Recent Reports

We applaud the administration for its work on this issue and the proposed budget trailer language. It is critical that the Legislature take swift action to pass this bill through the budget process. Several years ago, the Department of Industrial Relations contracted with Rand to study the explosion in SIBTF costs and recommend solutions, and that report was issued in June of 2024. The subsequent LAO report echoes much of Rand's analysis and recommendations. The LAO concluded, "The broadened SIBTF benefit program is no longer aligned with the Legislature's intended benefit structure for workers' compensation."

These independent recommendations, as implemented in the proposed budget trailer bill, realign the SIBTF with its original intent. Critically, the proposed language:

- **Revises Eligibility Criteria to Protect Legitimate Claims**
  Administrative law decisions and outdated statutes have allowed aggressive attorneys to expand eligibility for SIBTF benefits beyond its original intent.

- **Requires Previous Documentation of Pre-existing Conditions**
  Current law allows qualifying pre-existing conditions to be established without prior documentation by worker testimony alone, and this can be after the workplace injury occurs while trying to establish justification for SIBTF benefits.

- **Restores Appropriate Method of Combining Multiple Disabilities**
  The 2020 decision in *Todd v. SIBTF* dramatically altered the method by which the prior disability and workplace disability are added together to determine SIBTF benefits. This decision changed longtime practices that considered the interaction between disabilities in multiple body parts and instead allows disabilities to be combined based on simple addition. This has caused the number of maximum awards to skyrocket, including in cases where it is not appropriate.

- **Applies Well-established Medical Legal Report Laws to SIBTF**
  Employer and labor representatives have collaborated twice in the last 20 years to negotiate mutually agreeable reforms to the workers' compensation system. In one of those reform negotiations, the state established new rules and processes for obtaining medical-legal reports that are necessary for deciding benefit levels. Unfortunately, those processes were not applied to the SIBTF claims because the rules for SIBTF claims are in a separate labor code section.

The proposed budget trailer bill language must be passed and signed into law now. The explosion in costs and worsening delays for injured workers with severe, pre-existing disabilities over the next decade will continue unabated if legislative action isn't immediately taken, harming California's fiscal outlook.

Sincerely,

Ashley Hoffman
Vice President and Deputy Chief of Staff for Advocacy
California Chamber of Commerce

Associated Builders and Contractors of California (ABC of CA), Laurie Kendall
Acclamation Insurance Management Services (AIMS), Dominic Russo
Allied Managed Care (AMC), Dominic Russo
American Builders and Contractors of California, Michelle Rubalcava
American Property Casualty Insurance Association (APCAI), Laura Curtis
Associated General Contractors – San Diego Chapter, Matt Easley
Associated General Contractors of California, Matt Easley
Brea Chamber of Commerce, Lachlan Shon
California Alliance of Self-Insured Groups (CA-SIG), Clay A. Jackson
California State Association of Counties (CSAC), Eric Lawyer
California Association of Sheet Metal and Air Conditioning Contractors National Association, Chris Walker
California Association of Joint Powers Authority (California JPA), Faith Borges
California Association of Winegrape Growers, Michael Miller
California Attractions and Parks Association, Sabrina Demayo Lockhart
California Building Industry Association (CBIA), Vanessa Chavez
California Coalition on Workers' Compensation, Jason Schmelzer
California Craft Brewers Association, Kelsey McQuaid-Craig
California Farm Labor Contractor Association, Kimberly E. Clark
California Forestry Association, Matt Dias
California Fuels and Convenience Alliance (CFCA), Alessandra Magnasco
California Grocers Association (CGA), Rachael O'Brien
California Hospital Association, Erika Frank
California Hotel + Lodging Association, Lynn S. Mohrfeld
California Joint Powers Insurance Authority (California JPIA), Jeff Rush
California Manufacturers and Technology Association, Sarah Bridges
California Restaurant Association, Matt Sutton
California Retailers Association, Ryan Allain
California Self Insurers Association, Jill Dulich
California Special Districts Association, Aaron Avery
California Trucking Association, Nick Chiappe
Carlsbad Chamber of Commerce, Bret Schanzenbach
Danville Area Chamber of Commerce, Amy Millington
Flasher Barricade Association (FBA), Kenneth Johnston
Gateway Chamber of Commerce, Caren Spilsbury
Greater Bakersfield Chamber, Joel Paramo
Lean on Me, INC., Sandy P. Castañeda
Long Beach Area Chamber of Commerce, Celeste Wilson
Mission Viejo Chamber of Commerce, David Benson
Murrieta/Wildomar Chamber of Commerce, Adam A. Ruiz
National Association of Industrial and Office Parks (NAIOP) SoCal, Mihran Toumajan

National Federation of Independent Business (NFIB), Tim Taylor
Networks by Design, Frank Lewis
Nonprofits United, Dan Berry
Norwalk Chamber of Commerce, Caren Spilsbury
Palm Dessert Area Chamber of Commerce, Patrick Klein
Partners Personnel, Brad Pearce
Protected Insurance Program for Schools & Community Colleges Joint Powers Authority (PIPS), Christopher Peters
Public Risk Innovation, Solutions, and Management (PRISM), Jen Hamelin
Reed Family Companies, Casey Razma
Rural County Representatives of California (RCRC), Sarah Dukett
Santa Clarita Valley Chamber of Commerce, Mitchell van Bekkum
School Insurance Group, Dr. Kelli Hanson
Self-Insurers' Security Fund (SISF), Jill Dulich
South West California Legislative Council, Adam A. Ruiz

cc: Luke Reidenbach, Chief Deputy Legislative Secretary,
Governor Gavin Newsom Office of Legislative Affairs

Jano Dekermenjian, Consultant
Senate President proTem Monique Limón Policy Office

Tim Rainey, Consultant
Assembly Speaker Robert Rivas Policy Office

California Coalition on Workers' Compensation
CCWC
CAJPA
California Association of Joint Powers Authorities
CALIFORNIA HOTEL & LODGING ASSOCIATION
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Public Risk Innovation, Solutions, and Management
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SAN DIEGO CHAPTER
American Property Casualty Insurance Association
INSURING AMERICA
SWCLC Southwest California Legislative Council
CALIFORNIA TRUCKING ASSOCIATION
We drive for a living. Safety is our priority.
NFIB
California Hospital Association

March 4, 2026

The Honorable Liz Ortega
Chair, Assembly Labor and Employment Committee
1021 O Street, Suite 5120
Sacramento, CA 95814

RE: AB 1576 (Ortega) – Subsequent Injuries Benefit Trust Fund
OPPOSE

Dear Assemblymember Ortega,

The undersigned organizations respectfully **OPPOSE** your **AB 1576** because it does not adequately address the myriad problems with the Subsequent Injuries Benefit Trust Fund (SIBTF). SIBTF claims have skyrocketed in recent years, creating a fiscal crisis as recognized by two recent reports from the Legislative Analyst's Office and the Department of Industrial Relations (DIR) through RAND. While AB 1576 does include some desirable shifts in policy, it leaves the job unfinished much like AB 1329 (Ortega, 2025). Governor Newsom's veto stated that AB 1329 "does not contain the comprehensive reforms necessary to save SIBTF" and called on DIR to develop a comprehensive budget proposal. Governor Newsom's SIBTF reform proposal is being considered as a budget trailer bill, and we support that proposal.

California's SIBTF was established in 1945 with the purpose of encouraging employers to hire and retain workers that suffered from pre-existing disabilities. At the time, there was concern that employers would be reluctant to hire workers with disabilities for fear that the employer would be fully liable for the combined effects of an existing disability and a new workplace injury. SIBTF was established to protect the interests of veterans returning from World War II who were seeking to return to the workforce but presented a liability risk to employers.

While both state and federal law have evolved to protect workers from discrimination, SIBTF still serves an important function for injured workers who face the unfortunate results of combined industrial and non-industrial disabilities or impairments. A series of unfortunate court decisions combined with aggressive litigation tactics have caused the SIBTF to spin wildly out of control. The volume of applicants has nearly tripled over the past decade, causing assessments on employers to rise 800% between 2011 and 2024. Total annual payments from SIBTF have grown from $13.6 million in 2010 to $232 million in 2022. Total fund liabilities for resolved and pending cases between 2010 and 2022 are estimated at $7.9 billion (with some actuarial studies estimating the current cost closer to $28 billion), which is paid by direct assessments on both public and private employers. Unfortunately, AB 1576 does nothing to address the underlying court decisions and so will not impact the root causes for the increasing costs, which continue to spiral out of control: the DWC has projected that the SIBTF call volume will increase 25% in the next year.

The precipitous increase in the number of applications and payouts from the fund are the result of several factors, only some of which are addressed by the current contents of AB 1576. Our organizations believe that the legislature should address the easily identifiable problems with SIBTF in a comprehensive manner. The Department of Industrial Relations commissioned a study of the fund and its recent explosion in applicants and payments, and made several findings that could help the legislature identify reasonable and balanced policy solutions. The Legislative Analyst's

Office (LAO) also prepared a similar report that can help guide comprehensive reform that will stabilize the fund for those who need it. There is a clear path to controlling employer SIBTF costs:

- **Establish Stricter Eligibility Criteria**
  Administrative law decisions and outdated statutes have allowed aggressive attorneys to expand eligibility for SIBTF benefits beyond the original intent.

- **Require Previous Documentation of Pre-existing Conditions**
  Current law allows qualifying pre-existing conditions to be established without prior documentation by worker testimony alone, and this can be after the workplace injury occurs while trying to establish justification for SIBTF benefits. The legislature should follow the RAND and LAO recommendations and require prior documentation though medical records, workplace accommodations, or worker testimony prior to the workplace injury.

- **Restore Appropriate Method of Combining Multiple Disabilities**
  The 2020 decision in *Todd v. SIBTF* dramatically altered the method by which the prior disability and workplace disability are added together to determine SIBTF benefits. This decision changed longtime practices that considered the interaction between disabilities in multiple body parts and instead allows disabilities to be combined based on simple addition. Both RAND and the LAO have found that this decision made it far easier for applicants to justify the maximum SIBTF benefit. The legislature should overturn this court decision and return rationality to the method of combining multiple disabilities.

- **Applying Medical Legal Report Laws to SIBTF**
  Employer and labor representatives have collaborated twice in the last 20 years to negotiate mutually agreeable reforms to the workers' compensation system. In one of those reform negotiations, the state established new rules and processes for obtaining medical-legal reports that are necessary for deciding benefit levels. Unfortunately, those processes were not applied to the SIBTF claims because the rules for SIBTF claims are in a separate Labor Code section.

- **Reinvest in Claims Administration**
  SIBTF claims are administered by the Division of Workers' Compensation (DWC), which is facing significant backlogs that drive up administrative costs, delay benefits, and result in poor outcomes. The LAO report finds that SIBTF cases typically take five years to process despite the underlying workers' compensation case already being resolved, and a quarter of SIBTF claims take eight years to resolve. The state should invest in better claims handling practices and ensure that administrators are fully staffed.

While AB 1576 helps create stricter criteria for pre-existing conditions including proper documentation, it fails to make changes to the initial eligibility threshold for serious injuries, disability rating structure, stacking of disabilities, or prioritization of severe cases to address the significant case backlog.

For these reasons, our organizations respectfully oppose **AB 1576**. If you have any questions, please contact Jason Schmelzer at jason@syaslpartners.com.

Sincerely,

Jason Schmelzer
California Coalition on Workers' Compensation

ABC California
Acclamation Insurance Management Services (AIMS)
Allied Managed Care (AMC)
American Property Casualty Insurance Association (APCIA)
Associated General Contractors – San Diego Chapter
Associated General Contractors, California
Brea Chamber of Commerce
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Schools Insurance Group
Southwest California Legislative Council

CC: Members and Consultants, Assembly Insurance Committee

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March 3, 2026

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

RE: AB 1617 (Alanis) Household hazardous waste: reporting
As introduced on January 21, 2026 – SUPPORT

Dear Chair Connolly,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we are pleased to support Assembly Bill 1617 (Alanis) regarding household hazardous waste reporting.

Currently, local household hazardous waste collection facilities are required to submit annual reports to both the Department of Resources and Recycling (CalRecycle) and the Department of Toxic Substances Control (DTSC). Although the reporting requirements are nearly identical, the two agencies operate on different reporting cycles—fiscal year for CalRecycle and calendar year for DTSC—resulting in unnecessary administrative burdens for local agencies.

AB 1617 would align the reporting periods for both agencies, streamlining compliance and reducing unnecessary workload and administrative costs for local governments. For these reasons, we are pleased to support AB 1617.

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

CMUA
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION
CSAC
WESTERN WATER
CalChamber
CALIFORNIA CHAMBER OF COMMERCE
SWCLC Southwest California Legislative Council
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CSDA
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Districts Stronger Together
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Association of California Water Agencies
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RUBIO CANON Land and Water ASSOCIATION
NORTH BAY LEADERSHIP COUNCIL
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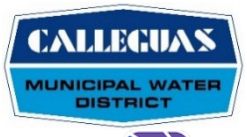
California Blueberry Association
PACIFIC EGG & POULTRY ASSN
CALIFORNIA BLUEBERRY COMMISSION
CALIFORNIA BEAN SHIPPERS ASSOCIATION
CALIFORNIA WAREHOUSE ASSOCIATION
California WALNUTS
WATER DISTRICT
Cucamonga Valley Water District
Service Beyond Expectation
California Seed Association
MesaWater DISTRICT
California Pear Growers Association
Walnut Valley Water District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MUNICIPAL WATER DISTRICT

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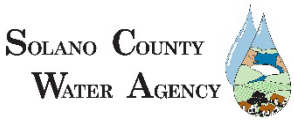
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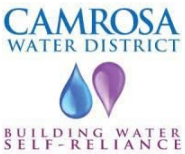
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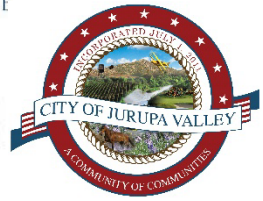
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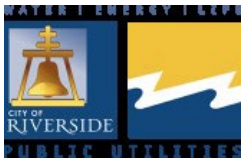
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March 5, 2026

Senator John Laird
Chair, Senate Budget and Fiscal Review Committee
1020 N Street, Room 502
Sacramento, CA 95814

Senator Eloise Gomez Reyes
Chair, Senate Budget Subcommittee 2
1020 N Street, Room 502
Sacramento, CA 95814

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

Assemblymember Steve Bennett
Chair, Assembly Budget Subcommittee 4
1021 O Street, Suite 8230
Sacramento, CA 95814

RE: Support for full funding for the implementation of SB 72 (Caballero 2025)

Dear Honorable Chairs,

The co-sponsors of SB 72, California Municipal Utilities Association (CMUA), California State Association of Counties (CSAC), and California Council for Environmental and Economic Balance (CCEEB), and the coalition of the organizations above respectfully request that the Legislature support full funding for the implementation of SB 72 in the 2026-27 budget as requested - $6.8 million annually for 5 years and $3.4 million annually thereafter.

The Legislature unanimously passed SB 72 (Caballero) last year, and the Governor signed this important piece of legislation that modernizes the California Water Plan and sets an interim water supply planning target. The legislation additionally requires the Department of Water Resources (DWR) to develop an action plan by 2033 to achieve long-term water supply targets by 2040.

The Governor's January 10, 2026 budget proposal proposes to include $5.8 million General Fund in fiscal year 2026-27 and annually for the next 4 years, and $2.4 million General Fund in 2031-32 and ongoing to fulfill the requirements of SB 72. DWR estimated the costs necessary to implement SB 72 as $6.8 million annually for the first 5 years and $3.4 million annually thereafter.

The Governor's proposed budget is $1 million short annually for SB 72 implementation. This shortage will result in a major delay in meeting the water supply targets set forth in SB 72. As set forth in the Administration's Budget Change Proposal, the shortfall will likely lead to a 5–10-year delay and would spread DWR staff thin to meet the requirements of the legislation. Delaying this critical work amidst California's uncertain climate future is not acceptable.

For these reasons, we respectfully request full funding for SB 72 implementation in the 2026-27 budget. 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

Charles Delgado
Legislative Advocate
California State Association of Counties

Tim Carmichael
President/CEO
CCEEB

Debbie Murdock
Executive Director
Association of California Egg Farmers

Julia Bishop Hall
Senior Legislative Advocate
Association of California Water Agencies

Adrian Covert
Senior VP, Public Policy
Bay Area Council

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General Manager
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Jimi Netniss
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Jared Macias
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Legislative Affairs Lobbyist
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March 4, 2026

The Honorable Catherine Blakespear
Chair, Senate Committee on Environmental Quality
1021 O Street, Suite 7720
Sacramento, CA 95814

RE: SB 872 (McNerney) Climate change: funding priorities.
As Amended February 18, 2026 –Notice of SUPPORT

Dear Chair Blakespear,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of SB 872 (McNerney).

This bill would allocate from the Greenhouse Gas Reduction Fund (GGRF) $150 million annually to the Department of Water Resources (DWR) for repair of land subsidence-related damages to state water conveyance systems, with special priority given to projects in groundwater basins where subsidence best management practices (as determined by DWR) are being implemented. Additionally, this bill would allocate from GGRF $150 million annually to the Sacramento-San Joaquin Delta Conservancy for levee improvement projects, with prioritization given to projects that also improve habitat.

Large-scale investment in California's water infrastructure is vitally important. This commitment to water supply for all beneficial uses, safeguarding the environment, protecting life and property from flood disasters, and ensuring community drinking water supplies, has been demonstrated by the Legislature and the Administration consistently through prior budget allocations and through measures like Proposition 4. The scale of the challenges facing California's water future, however, means that there is still much work to be done.

The recent changes to federal funding policies and the current year's budget deficit have underscored the need for creative solutions to our water challenges. Despite current uncertainties in the state financial position, the urgent need to adapt our water infrastructure to the realities of the post-climate change world remains.

This bill is an ambitious solution to two critical areas of need in our water infrastructure: conveyance and Delta flood protection. Aqueducts, channels,

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and other infrastructure that our water managers rely on have been compromised by land subsidence from decades of overpumping of groundwater, a situation that is only recently being addressed by the implementation of the Sustainable Groundwater Management Act. Without this infrastructure, deliveries of water to farmers, communities, businesses, and all other users are threatened. A recent DWR study characterizes the impact of subsidence on water infrastructure to be in the billions of dollars[1].

Meanwhile, the Sacramento-San Joaquin Delta, where the risk posed by an aging system of 1,100 miles of levees threatens not only local communities with catastrophic flooding, but also the reliability of the state's primary water conveyance system, will require at least $3.2 billion in repairs to these levees by 2050, with $1 billion of that amount needed in the next five years, according to the Delta Stewardship Council and DWR[2].

This bill leverages the funding generated by the state's innovative Cap and Invest Program to address two areas of critical need, in a manner that respects the needs of Delta counties and local communities and also results in environmental co-benefits. CSAC applauds the timelines and scale of this much-needed, ambitious measure.

For these reasons, we are supporting SB 872 (McNerney). If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

[1] https://water.ca.gov/-/media/DWR-Website/Web-Pages/News-Releases/Files/251015_SJV-Conveyance-Study_layout_v7.pdf

[2] https://calmatters.org/environment/water/2025/04/delta-levees-risk-of-floods-repairs-cost-3-billion/

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March 2, 2026

The Honorable Josh Becker
Chair, Senate Committee on Natural Resources and Water
1021 O Street, Suite 3220
Sacramento, CA 95814

RE: SB 997 (Caballero) North Fork Kings Groundwater Sustainability Agency: lien authority.
As introduced on February 9, 2026 –Notice of SUPPORT

Dear Chair Becker,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of SB 997 (Caballero).

This bill would correct an oversight in the statute establishing the North Fork Kings Groundwater Sustainability Agency (GSA) by providing the agency with the authority to impose civil penalties on groundwater users who exceed established limits on pumping, and the authority to establish liens associated with unpaid penalties. This change would bring the authority of the North Fork Kings GSA in line with other GSAs.

Counties have a vital role to play in the successful implementation of the Sustainable Groundwater Management Act (SGMA). They are frequent participants in GSAs across the state, and particularly the Central Valley, where the County of Fresno helps to run the North Fork Kings GSA. County supervisors and staff have responsibilities and expertise in land use, drinking water, irrigation, wells, agricultural practices, and almost every other aspect of groundwater management. In many subbasins, counties have been key architects of groundwater sustainability plans alongside their SGMA partners and have shouldered the responsibility of administering many of the reporting, data management, allocation, and oversight duties that GSAs carry out. It is at the local level, through partnerships between local governments and communities, farmers, conservationists, and all other stakeholders, where sustainability will be achieved.

The Kings Subbasin is a critically overdrafted groundwater basin under SGMA. As such, local entities charged with implementing state-imposed SGMA requirements must have the necessary authorities to ensure that groundwater supplies are managed wisely for the benefit of agriculture,

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communities, and the environment. This bill merely extends the authorities currently given to other GSAs to the North Fork Kings GSA, enabling the County of Fresno and its partners to meet the pressing water challenges in this subbasin. CSAC supports SB 997 and other measures that responsibly empower local agencies to meet their mandates and secure their water future for generations to come.

If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

California State Association of Counties®

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March 3, 2026

The Honorable Henry Stern
Chair, Senate Committee on Emergency Management
1021 O Street, Suite 7710
Sacramento, CA 95814

RE: SB 1001 (Archuleta) Water utility workers identification card program.
As introduced on February 9, 2026 –Notice of SUPPORT

Dear Chair Stern,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of SB 1001 (Archuleta).

This bill would require the California Governor's Office of Emergency Services (CalOES) to develop identification cards for local water utility workers, in order to allow them to access areas affected by floods, storms, fires, earthquakes, or other disasters and restore affected water infrastructure. The bill would establish authorities and guidance for law enforcement officers to allow water utility workers carrying these identification cards to access disaster-stricken areas and perform their duties.

Proper disaster response must include restoring essential services to affected residents as soon as possible. As counties, we are among the many local government entities that ensure the continuity and restoration of water service to our constituents, without which homes become uninhabitable and response services delayed and obstructed. This measure assists our water utility workers in carrying out their duties and restoring service as quickly as possible in emergency situations by making them easily identifiable to law enforcement. The recent Palisades and Eaton wildfires, only the latest in a series of catastrophic disaster events, have demonstrated the need to ensure that response efforts are as coordinated as possible. This bill would be a valuable step forward in those efforts.

For these reasons, we are pleased to support SB 1001. If you have any questions about our position, please do not hesitate to reach out to me at cdelgado@counties.org.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

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Santa Clara County

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February 4, 2026

The Honorable Nick Schultz
Chair, Assembly Committee on Public Safety
1020 N Street, Room 111
Sacramento, CA 95814

RE: AB 1549 (Krell) Alternative domestic violence program.
As introduced January 7, 2026 – CO-SPONSOR

Dear Assemblymember Schultz,

The California State Association of Counties (CSAC), Chief Probation Officers of California (CPOC), and California District Attorneys Association (CDAA) write in strong support and proud co-sponsors of Assembly Bill (AB) 1549 by Assemblymember Maggy Krell. This measure proposes extending the alternative domestic violence batterer's intervention pilot program, established by AB 372 (Chapter 290, Statue of 2018), from the current sunset date of July 1, 2026, to July 1, 2030. It also proposes adding Sacramento County to the list of participating pilot counties.

Existing law established in the early 1990s requires that individuals placed on probation for domestic violence battery must complete a 52-week batterer intervention program, which current statute offers minimal opportunities to explore other programming options that could more effectively meet the individualized, criminogenic needs of those who have committed domestic violence. To help address this considerable public health and safety concern, in 2017, CSAC, along with CPOC and other county affiliates, set out to further assess domestic violence programming by co-sponsoring AB 372. This bill was aimed at advancing batterer intervention programming, authorizing six counties (Napa, San Luis Obispo, Santa Barbara, Santa Clara, Santa Cruz, and Yolo) to pilot innovative, alternative, evidence-based, approaches with the long-term goal of improving outcomes.

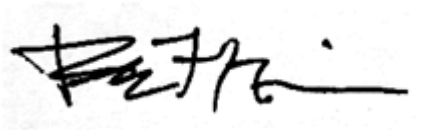
To date, the work under AB 372 has led to local batterer intervention program modifications, curriculum advancements, briefs on California's domestic violence system, recidivism research, and annual reporting. After the first five years of implementation, over 6,900 individuals have entered programs across the six counties. While progress has been made in this area, there remains work to be done to expand evidence-based practices that will

change thinking patterns, reduce anti-social behavior, and better understand the complex relationship between the risk of reoffending and treatment needs.

Simply put, AB 1549 would allow seven counties, program participants, survivors of intimate partner violence, service providers, and experts in this field to continue to engage in the work to develop more effective alternative treatment programs that reduce domestic violence. It is for these reasons that CSAC, CPOC, and CDAA are co-sponsors of AB 1549 and respectfully request your AYE vote.

Should you have any questions, please do not hesitate to contact Ryan Morimune at CSAC (rmorimune@counties.org), Danielle Sanchez at CPOC (danielle@wpssgroup.com), or Kim Stone at CDAA (kim@stoneadvocacy.com).

Sincerely,



Ryan Morimune
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rmormimune@counties.org

Danielle Sanchez
Legislative Director, CPOC
danielle@wpssgroup.com

Kim Stone
Lobbyist, CDAA
kim@stoneadvocacy.com

CC: Members and Consultants, Assembly Committee on Public Safety
The Honorable Maggy Krell, California State Assembly

February 2, 2026

Board of State and Community Corrections
Attn: Amanda Ferreira
Staff Services Manager I (Specialist)
2590 Venture Oaks Way, Suite 200
Sacramento, CA 95833

Ms. Ferreira,

This public comment is provided on behalf of the Chief Probation Officers of California, the California State Association of Counties, the Rural County Representatives of California, and the Urban Counties of California specific to ***Section 1315. Corrective Action Plan for Noncompliance proposed for inclusion within the Title 15, Division 1, Chapter 1, Subchapter 5 Minimum Standards for Juvenile Facilities.***

We respectfully outline our significant concerns regarding the proposed new Section 1315 for addition to Title 15 Minimum Standards for Juvenile Facilities. We would note we also shared concerns when the changes to Welfare and Institutions Code 209 were considered by the Governor and the Legislature. Our concerns about the lack of a fair appeal process have only grown more acute as the Board of State and Community Corrections (BSCC) continues to work through the larger Title 15 Minimum Standards for Juvenile Facilities Regulation Revision process begun in 2022. Those proposed revisions lack clarity, are not inspectable, and create operational concerns that will likely only lead to more subjectivity during the inspection process. We outline our concerns with these proposed regulations as noted:

1. **Fair Appeal Process is Absent.** The appeal process outlined in ***Section (e) Board Ratification Process*** lacks a neutral arbitrator when and if a county believes that the Board delegee has unjustly denied a corrective action plan or overruled a previously Board delegee-approved corrective action plan, which may, in turn, trigger an unsuitability determination. The proposed regulation outlines that every approval or denial of a county's corrective action plan is to be ratified by the Board. Any denial of a corrective action plan will not be subject to an appeal pursuant to Section 1314 of Title 15 Minimum Standards for Juvenile Facilities, as that process would ultimately bring the appeal back to the Board. Therefore, if the Board, or its delegee, denies a corrective action plan and the county believes the Board, or its delegee, is not just in its denial, there is no remedy available to the county to present a rebuttal. The Board sets the regulations, interprets and inspects juvenile facilities against those regulations, identifies items of noncompliance if applicable, approves and denies

corrective action plans, and determines when a corrective action plan has been successfully completed. At any time during this process the only appeal mechanism available is through the BSCC via the Executive Director, the Board or nonexistent (as outlined in Section (e)). At no point is a neutral arbitrator available to the county.

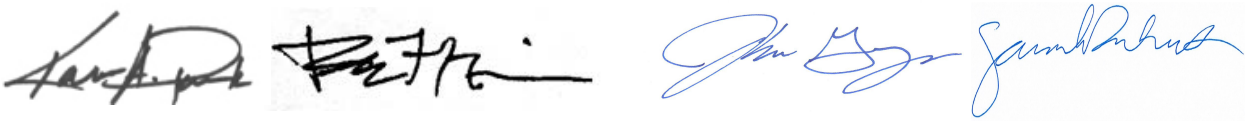
2. **Timelines unclear.** If the Board overrules a corrective action plan previously approved by its delegee and there remains time within the 60-day window to submit the corrective action plan, the regulation does not contain a mechanism to return the plan back to the probation department and county to revise its plan to address concerns and/or gaps identified by the Board, that were somehow missed by its delegee. Up to this point, the county had no reason to believe its corrective action plan (likely completed with technical assistance from BSCC staff) would be denied and will have been acting in good faith to correct any items of noncompliance pursuant to the steps outlined in its corrective action plan.

   Further, if a county is in the process of appealing to the Executive Director via Section 1314(b) of the existing Title 15 Minimum Standards for Juvenile Facilities, regarding an item identified as being noncompliant and for which it is to submit a corrective action plan, and that appeal is not resolved within the 60 days and therefore a Corrective Action Plan is yet not submitted, as drafted the only resolution is that the facility is deemed unsuitable pending the resolution of the appeal.

As the BSCC is aware, county juvenile facilities must maintain 100 percent compliance with all Title 15 Juvenile Facility Minimum Standards. With the shift in the most recent Title 15 Juvenile Facility Revision cycle toward policy-making rather than the establishment of minimum regulatory standards and the subjectivity now built into the inspection process, it is imperative that a neutral arbitrator be accessible to both the county and the state to resolve differences.

The state has bestowed greater responsibility upon counties after the closure of the Division of Juvenile Justice, resulting in the juvenile justice system becoming a locally administered, county and court-run system. The state is responsible for implementing the regulatory framework for minimum standards that counties must meet or exceed, providing important checks and balances for safe facility operations and adherence to standards. Counties, specifically probation departments, in turn, are responsible for providing 24-hour safe and secure care and supervision of youth requiring secure confinement. These shared responsibilities require the state and counties to work collaboratively to establish fair and transparent processes.

Respectfully,



Karen A. Pank	Ryan Morimune	Joshua Gauger	Sarah Dukett
Executive Director	Senior Legislative Advocate	Legislative Advocate	Senior Policy Advocate
CPOC	CSAC	UCC	RCRC

OFFICERS

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Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

Assemblymember Natasha Johnson
California State Assembly, District 63
1021 O Street, Suite 4520
Sacramento, CA 95814

RE: Assembly Concurrent Resolution 133 (Johnson) – Introduce a Girl to Engineering Day

Dear Assemblymember Johnson:

The California State Association of Counties (CSAC), representing California's 58 counties, is pleased to support ACR 133, which will commemorate February 26th as Introduce a Girl to Engineering Day. Counties recognize the need for a workforce that is inclusive of all people, especially women.

Counties rely on engineers to provide vital services, such as roads, water infrastructure, hospitals, county buildings, flood control structures and other critical infrastructure that provides critical services to the public. Counties directly employ thousands of engineers and rely on thousands more in the private sector to deliver and manage the infrastructure projects that serve the residents of California.

Counties recognize the critical contributions of women in engineering and the need for state and local government to continue their commitment to support efforts to introduce more young women to careers in engineering. Counties are pleased to support efforts to inspire more women to pursue careers in engineering. Counties broadly support increased investments to strengthen women in the county engineer workforce, expanding educational and job training pathways, and policies that can help counties more effectively recruit, hire, and retain women in county engineering roles as well as careers in other science, technology, engineering, and mathematics (STEM) related fields.

For these reasons, CSAC is a proud supporter of ACR 133.

OFFICERS

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties
mneuburger@counties.org

February 3, 2026

The Honorable Gavin Newsom
Governor of California
1021 O Street, Ste. 9000
Sacramento, CA 95814

Senate President Pro Tempore Monique Limón
1021 O Street, Ste. 8518
Sacramento, CA 95814

Assembly Speaker Robert Rivas
1021 O Street, Ste. 8330
Sacramento, CA 95814

Senate Budget Chair John Laird
1021 O Street, Ste. 8720
Sacramento, CA 95814

Assembly Budget Chair Jesse Gabriel
1021 O Street, Ste. 8230
Sacramento, CA 95814

Senate Budget Subcommittee 4 Chair Melissa Hurtado
1021 O St. Ste. 6510
Sacramento, CA 95814

Assembly Budget Subcommittee 5 Chair Sharon Quirk-Silva
1021 O Street, Ste. 4210
Sacramento, CA 95814

RE: Homeless Housing, Assistance and Prevention Program (HHAP) Budget Request

Dear Governor Newsom, Senate President pro Tempore Limón, Assembly Speaker Rivas, Senate Budget Chair Laird, Assembly Budget Chair Gabriel, Senate Sub 4 Chair Hurtado, and Assembly Sub 5 Chair Quirk-Silva:

Thank you for your continued leadership of our collective efforts to reduce homelessness in California. Our organizations are committed to ensuring that the Homeless Housing, Assistance and Prevention (HHAP) program can effectively combat the homelessness crisis across California.

While we are eager to partner with the state on implementing the $500 million promised in last year's budget for Round 7 of the HHAP program, **ongoing funding of at least $1 billion annually remains critical** to sustain the historic progress being made to house and serve more Californians than ever before. California's increases in homelessness

have flattened, with over 90,000 people placed into permanent housing thanks to HHAP since 2023. Recently reported initial point-in-time count data demonstrates that our state has achieved a 9% reduction in unsheltered homelessness. It is clear that the state must maintain a full commitment to the HHAP program that is essential to making continued progress possible.

Besides the threat of a loss of state funding, California's homeless response efforts are further in jeopardy, with over 41,000 people at extreme risk of falling back into homelessness due to funding cuts, policy changes, and uncertainty at the federal level. Now is not the time to relent on our state's commitments to reducing homelessness.

The current $500 million reduction in planned funding for HHAP Round 7 would force cuts to shelter capacity, eliminate rental assistance, and halt the development of supportive housing at a time when the need is rising and reduced federal resources are creating threats to our state's safety net system. **We request the most recent round of HHAP to be restored to prior funding levels of $1 billion and annual investments for HHAP of $1 billion that more closely match the scale of the crisis** so that, even amid economic uncertainty, we can help residents find stable housing and prevent more people from falling into homelessness.

SB 131 (Chapter 24, Statutes of 2025) includes intent language that specifies the parameters for Round 7 funding. The following conditions are priorities that will be required of applicants for Round 7:

- Obligation of at least 50% of their Round 6 award;
- Having a compliant housing element;
- Enacting a local encampment policy consistent with administration guidance;
- Receiving a designation of "pro-housing;"
- Leveraging local resources to scale state investments;
- Demonstrating progress on key housing performance metrics; and
- Demonstrating urgency and measurable results in housing and homelessness prevention.

Subsequent legislation is needed to enact these requirements and as that language is negotiated, we recommend adhering to the following principles:

1) **Avoid a funding gap and ensure that Round 7 funding is distributed early in the 2026-27 budget year.** Many HHAP-funded programs require ongoing investments, yet the one-time nature of each HHAP round makes it difficult for grantees to plan, since future funding is uncertain and often delayed. For example, although HHAP Round 6 was signed into law on July 2, 2024, grantees in only three counties just received the first 50% of funding, and the grantees in the remaining 55 counties are still waiting for any funding as it approaches 20 months from when this funding was appropriated. This forces local jurisdictions to take on financial risk and threatens the continuity of HHAP-funded services. To help avoid this situation again, we advocated for language that was included in budget trailer bill SB 158 (Chapter 650, Statutes of 2025), which would start Round 7 disbursements by September 2026. Working towards meeting this goal would

provide greater predictability and help prevent service reductions while communities wait for funds.

2) **Promote accountability without adding onerous application requirements.** We propose that, instead of requiring recipients to submit new, lengthy, and complicated applications for Round 7 funding, the Department of Housing and Community Development (HCD) allow applicants to revise and update their Round 6 applications, which will have been submitted less than a year prior. This process would maintain accountability while reducing the prolonged application process, which currently takes six months. We also propose that the department review and improve administrative efficiency, align performance metrics with existing federal standards, and provide technical assistance to support consistent tracking and performance evaluation across jurisdictions. This advances accountability while helping funds get out the door more quickly.

3) **Allow applicants the opportunity to secure Round 7 funds while substantially complying with the intent of SB 131.** Some of the new requirements require lengthy actions and approval processes by the state. For example, many applicants would not be able to feasibly obtain pro-housing designation before the September goal disbursement date. Because this requirement is new and applicants could not have anticipated having to comply with a designation largely focused on housing production, bogging down grantees in complexity and delaying applications will fail to improve HHAP outcomes and may worsen outcomes for Californians experiencing homelessness. An approach that enacts these new conditions in a manner that allows a grantee to demonstrate progress on key metrics will still achieve accountability while avoiding further delays in funding.

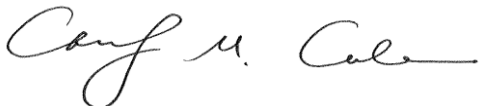
4) **Keep funding in the region.** Those experiencing homelessness should not lose access to vital programs and services because a jurisdiction is unable to comply with a Round 7 condition. We recommend mandating that HCD work with applicants who fall short of a requirement so that issues are quickly resolved before funding is withheld. Compliance should never be a reason for withholding or redirecting funding away from individuals who need support in a region.

We share the goals of ensuring accountability, particularly accountability to Californians experiencing homelessness on our streets and in our shelters. However, with uncertainty around future federal funding and a projected multiyear state budget deficit, communities across California are bracing for increased housing instability and homelessness. We look forward to working with you to achieve accountability, while also ensuring our communities are sustaining rental assistance, services, and operating grants for shelter and permanent housing that HHAP has successfully advanced.

Thank you for your continued leadership and collaboration.

Respectfully,

Graham Knaus
Chief Executive Officer
California State Association of Counties



Carolyn M. Coleman
Executive Director and CEO
League of California Cities

Patricia Lock Dawson
Mayor, City of Riverside
Chair, California Big City Mayors Coalition

Sharon Rapport
CSH, on behalf of
Bring California Home

January 30, 2026

The Honorable John Laird
1021 O St., Room 8720
Sacramento, CA 95814

RE: **SB 922 (Laird) Vehicles: local agency charges: use of streets or highways.**
CO-SPONSOR AND SUPPORT *(As Introduced on January 28, 2026)*

Dear Senator Laird,

The League of California Cities (Cal Cities), the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC) are pleased to **sponsor** and **support** SB 922, which would clarify and reaffirm long-standing local authority related to the recovery of street maintenance and repair costs associated with providing essential public services.

Local governments are responsible for maintaining most local streets and roads in California. Essential public services, including garbage, recycling, and green waste collection, rely on the regular use of local streets by heavy service vehicles. These vehicles are critical to protecting public health and environmental quality, and for decades their use of local streets has been accounted for through existing service-related rates, fees, or franchise arrangements.

Cities and counties have long worked collaboratively with service providers, including waste haulers, to incorporate the cost of maintaining streets used to deliver essential services into these established arrangements. These practices are familiar, predictable, and transparent for both local governments and service providers, and help ensure that streets remain safe and functional for the delivery of services communities rely on every day.

Recently, a court decision created uncertainty around these long-standing practices. As a result, cities and counties are facing litigation challenging existing service-related cost recovery mechanisms, placing critical street maintenance funding at risk and creating uncertainty for local governments and service providers alike.

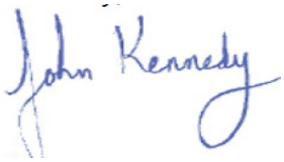
SB 922 would address this uncertainty by clarifying that restrictions on local road charges apply only to weight-based charges imposed for the privilege of using streets or highways. The bill further makes clear that fees for the provision of

public services may recover the cost of street maintenance and repair associated with providing such services. By reaffirming existing authority, SB 922 would restore clarity, reduce unnecessary litigation, and provide certainty for all parties involved.

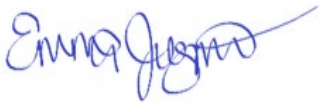
If you have any questions, do not hesitate to contact us at btriffo@calcities.org, ejungwirth@counties.org, or jkennedy@rcrcnet.org.

Sincerely,

Ben Triffo
League of California Cities
Legislative Advocate



John Kennedy
RCRC
Senior Policy Advocate



Emma Jungwirth
California State Association of Counties
Senior Legislative Advocate

February 4, 2026

The Honorable Nick Schultz
Chair, Assembly Committee on Public Safety
1020 N Street, Room 111
Sacramento, CA 95814

RE: AB 1549 (Krell) Alternative domestic violence program.
As introduced January 7, 2026 – CO-SPONSOR

Dear Assemblymember Schultz,

The California State Association of Counties (CSAC), Chief Probation Officers of California (CPOC), and California District Attorneys Association (CDAA) write in strong support and proud co-sponsors of Assembly Bill (AB) 1549 by Assemblymember Maggy Krell. This measure proposes extending the alternative domestic violence batterer's intervention pilot program, established by AB 372 (Chapter 290, Statue of 2018), from the current sunset date of July 1, 2026, to July 1, 2030. It also proposes adding Sacramento County to the list of participating pilot counties.

Existing law established in the early 1990s requires that individuals placed on probation for domestic violence battery must complete a 52-week batterer intervention program, which current statute offers minimal opportunities to explore other programming options that could more effectively meet the individualized, criminogenic needs of those who have committed domestic violence. To help address this considerable public health and safety concern, in 2017, CSAC, along with CPOC and other county affiliates, set out to further assess domestic violence programming by co-sponsoring AB 372. This bill was aimed at advancing batterer intervention programming, authorizing six counties (Napa, San Luis Obispo, Santa Barbara, Santa Clara, Santa Cruz, and Yolo) to pilot innovative, alternative, evidence-based, approaches with the long-term goal of improving outcomes.

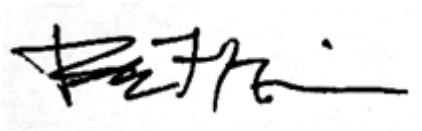
To date, the work under AB 372 has led to local batterer intervention program modifications, curriculum advancements, briefs on California's domestic violence system, recidivism research, and annual reporting. After the first five years of implementation, over 6,900 individuals have entered programs across the six counties. While progress has been made in this area, there remains work to be done to expand evidence-based practices that will

change thinking patterns, reduce anti-social behavior, and better understand the complex relationship between the risk of reoffending and treatment needs.

Simply put, AB 1549 would allow seven counties, program participants, survivors of intimate partner violence, service providers, and experts in this field to continue to engage in the work to develop more effective alternative treatment programs that reduce domestic violence. It is for these reasons that CSAC, CPOC, and CDAA are co-sponsors of AB 1549 and respectfully request your AYE vote.

Should you have any questions, please do not hesitate to contact Ryan Morimune at CSAC (rmorimune@counties.org), Danielle Sanchez at CPOC (danielle@wpssgroup.com), or Kim Stone at CDAA (kim@stoneadvocacy.com).

Sincerely,



Ryan Morimune
Senior Legislative Advocate, CSAC
rmormimune@counties.org

Danielle Sanchez
Legislative Director, CPOC
danielle@wpssgroup.com

Kim Stone
Lobbyist, CDAA
kim@stoneadvocacy.com

CC: Members and Consultants, Assembly Committee on Public Safety
The Honorable Maggy Krell, California State Assembly

FLOOR ALERT

To: Members of the California State Assembly

Date: January 27, 2026

Re: **Assembly Bill 1198 (Haney) – OPPOSE [As Amended January 22, 2026]**

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), Urban Counties of California (UCC), the League of California Cities (Cal Cities), California Association of School Business Officials (CASBO), and the California Special Districts Association (CSDA), we request your **NO** vote on AB 1198 (Haney).

AB 1198 would require, commencing July 1, 2027, that if the Director of the Department of Industrial Relations (DIR) determines, within a semiannual period, that there is a change in any prevailing rate of per diem wages in a locality, that determination applies to any public works contract that is awarded or for which notice to bidders is published after July 1, 2027. We have serious concerns about the potential impacts on the viability of public works projects.

- AB 1198 will result in unanticipated cost pressures or increases to public works projects mid-stream.
- AB 1198 creates further changes to the wages mid-stream for public works projects and will result in uncertainty in bidding and contracting, and put projects in jeopardy.
- Continual change orders during a public works project would make it impossible to predict the actual cost of a project and, consequently, difficult to budget funds accurately. These additional cost pressures may impact the ability of a jurisdiction to move forward with a project.
- Recent amendments exempting affordable housing projects acknowledge this bill puts projects at risk; however, these changes fail to address the impacts to critical infrastructure projects, leaving our fundamental concerns unresolved.

For the reasons stated, RCRC, CSAC, UCC, CalCities, CSDA, and CASBO request your **"NO"** vote when this bill comes to the floor. If you have any questions, please contact Sarah Dukett (RCRC) at sdukett@rcrcnet.org, or Anthony Tannehill (CSDA) at anthonyt@csda.net.

ASSEMBLY FLOOR ALERT

Assembly Bill 1383 (McKinnor) Public Employees' Retirement Benefits.

[As Amended January 22, 2026]

OPPOSE

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Association of California School Administrators (ACSA), and Urban Counties of California (UCC) request your **NO** vote on AB 1383 (McKinnor).

- AB 1383 would significantly increase pension obligations for state and local agencies by reversing key reforms enacted under The Public Employees' Pension Reform Act (PEPRA), which has stabilized pension systems and generated $5.8 billion in savings to date ($26.5 billion projected over 10 years).

- AB 1383 would have significant fiscal and administrative impacts, leading to higher employer and employee contribution rates, increased administrative costs, and heightened long-term solvency risk,

- The cost of this bill comes at a time of fiscal uncertainty and would exacerbate existing fiscal pressures when the state, schools, and local agencies are facing rising pension obligations, stagnant revenues, and new federal and state mandates, threatening core services, staffing levels, and local fiscal stability.

- Increased pension costs would crowd out salary growth and worsen equity issues, particularly between safety and non-safety employees, while potentially requiring higher employee contributions that undermine recruitment and retention.

- While public agencies support competitive recruitment and retention for all public employees, AB 1383 represents an unfunded mandate that fails to balance sustainable retirement benefits with taxpayer fairness and long-term financial stability.

For these reasons, we respectfully
request your "NO" vote on **AB 1383.**

FLOOR ALERT

AB 1421 (Wilson) – SUPPORT

File Item: #19

Legislation to Address California's Looming Transportation Funding Crisis

SUMMARY:
AB 1421 establishes a focused, research-driven process to inform future transportation funding decisions to replace declining gas tax revenues in a fair and sustainable way. The bill would require the California Transportation Commission (CTC) to submit a report to the appropriate policy and fiscal committees of the Legislature by January 1, 2027. The report would address key policy considerations such as equity impacts of proposed funding solutions on low-income drivers and long-distance commuters.

FACTS:

- For more than a century, fuel excise taxes covered all drivers and served as a user-based system for funding maintenance, repairs and improvements to California's multimodal transportation system.
- Increased vehicle fuel efficiency and adoption of zero-emission vehicles have reduced gas tax revenues, as more drivers of these vehicles contribute less toward maintaining the state's transportation system.
- According to estimates by the California Transportation Commission, the transportation funding shortfall that the state and local communities are already facing is expected to grow by approximately $31 billion over the next 10 years.
- AB 1421 does not raise any taxes or impose any fees, and it does not prejudge any funding solution.

CONTACT:
Kiana Valentine, Transportation CA, kiana@politicogroup.com / 916-266-3892
Jason Bryant, Transportation CA, jason@bryantga.com / (916) 599-1826

We respectfully urge an "aye" vote on AB 1421 (Wilson).

January 16, 2026

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

RE: Senate Bill 299 (Cabaldon) - SUPPORT
As Amended January 14, 2026

Dear Chair Caballero:

On behalf of the Rural County Representatives of California, Le Petit Elephant, the California State Association of Counties, Build Up California, Napa County Supervisor Anne Cottrell, Napa County Supervisor Liz Alessio, American Planning Association (California Chapter), League of California Cities, Low Income Investment Fund, Community Resources for Children, CalChamber, Child Action, Children Now, First 5 Association, and the Urban Counties of California, we are pleased to support Senate Bill 299 (Cabaldon), which seeks to protect daycares from California Environmental Quality Act (CEQA) misuse.

Senate Bill 299 expands a recently-enacted CEQA exemption for day care centers to projects located in residential areas.

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 in an attempt to 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*.

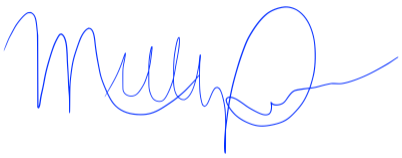
Senate Bill 131 (Budget, Chapter 24, Statutes of 2025) sought to exempt day care centers from CEQA and thereby insulate much-needed projects from the real possibility of expensive and protracted CEQA compliance and litigation. While we sincerely appreciate the Legislature's attempt to exempt daycares from CEQA, SB 131's exemption does not apply to daycares located in "a residential area", which is 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. SB 299 builds upon that new exemption by expanding it to day care centers in residential areas, provided the parcel on which the project is located is not zoned exclusively for residential use.

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. SB 299 helps providers and communities expand daycare opportunities.

For these reasons, and given the demonstrated need to prevent future CEQA abuse, we are pleased to support Senate Bill 299 and respectfully request your "aye" vote when this measure is heard before the committee. Please do not hesitate to contact us if you have any questions.

Sincerely,

JOHN KENNEDY
Rural County Representatives of California
Senior Policy Advocate
jkennedy@rcrcnet.org



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cc: The Honorable Christopher Cabaldon, California State Senate
The Honorable Sasha Renée Pérez, California State Senate
Ashley Ames, Consultant, Senate Appropriations Committee
Scott Seekatz, Consultant, Senate Republican Caucus

California State Association of Counties®

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January 28, 2026

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

RE: SB 694 (Archuleta) Deceptive practices: service members and veterans.
As enrolled on January 27, 2026 – REQUEST FOR SIGNATURE

Dear Honorable Governor Newsom,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write to **request your signature** on Senate Bill 694 (Archuleta). This measure strengthens consumer protections for veterans in California by ensuring that only accredited individuals may charge for services related to filing claims for U.S. Department of Veterans Affairs (VA) benefits.

Veterans' benefits are a crucial support system for those who have served this country in the armed forces. As with other government benefits, applicants may need assistance in applying for these critical benefits. California veterans who need assistance with filing a claim for disability benefits can get help at no charge from their VA-accredited county veterans service office (CVSO) or from nonprofit veterans service organizations (VSOs). CVSOs are county agencies established to assist veterans and their families in obtaining benefits and services accrued through military service. In addition to CVSOs and nonprofit VSOs, which provide assistance free of charge, the VA also accredits attorneys and claims agents to represent veterans and assist with benefit claims. Accredited attorneys and claims agents cannot charge money for assistance with an initial claim for veteran's benefits, but, subject to limits set and enforced by the VA, they can charge for other services. The VA accreditation program exists to ensure that veterans receive competent and fair representation on their VA benefits claims.

Despite this structure, counties witness firsthand how vulnerable veterans can be misled by unaccredited actors who charge illegal or excessive fees, jeopardize personal data, and often leave veterans worse off. Prohibiting unaccredited claims agents and lawyers from charging a veteran for help with an initial benefits claim not only protects veterans, but it also ensures

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that counties continue to play a crucial role in connecting their resident veterans with benefits and services available to them. County governments often collaborate with federal and state agencies, as well as local nonprofit organizations, to ensure that veterans are aware of and have access to the benefits they are entitled to. By working with veterans and their families, counties can ensure that those who have served their country receive the support and assistance they deserve.

SB 694 reinforces a strong framework for ethical and qualified representation, taking steps to eliminate unethical practices that exploit vulnerable veterans. We believe California's veterans deserve the most transparent and accountable support when applying for the benefits they have earned through service.

For these reasons, CSAC is pleased to support SB 694 and **respectfully requests your signature** on this measure. Should you have any questions or concerns please contact me at ejungwirth@counties.org.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate, CSAC

CC : The Honorable Bob Archuleta, California State Senate
The Honorable Pilar Schiavo, California State Assembly
Christine Aurre, Legislative Secretary, California Governor's Office
Sam Miller, Deputy Legislative Secretary and Chief of Legislative Operations, California Governor's Office

January 14, 2026

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

RE: Assembly Bill 1198 (Haney) – OPPOSE
As Introduced on February 21, 2025

Dear Chair Wicks,

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), Urban Counties of California (UCC), the League of California Cities (Cal Cities), California Association of School Business Officials (CASBO), and the California Special Districts Association (CSDA), we write in respectful opposition to Assembly Bill 1198 (Haney).

AB 1198 would require, commencing July 1, 2026, that if the Director of the Department of Industrial Relations (DIR) determines, within a semiannual period, that there is a change in any prevailing rate of per diem wages in a locality, that determination applies to any public works contract that is awarded or for which notice to bidders is published after July 1, 2026. We have serious concerns about potential unanticipated cost pressures or increases to public works projects mid-stream and the costs to the contractor that would need to recoup these unexpected costs because of prevailing wages increasing during an ongoing contract.

Currently, when a project is first advertised for bid, the public agency (as well as the contractor) can go to a webpage managed by DIR to see what the prevailing wage rates are. These wage rates generally include those upcoming increases which will occur during the duration of the project. We are concerned that further changes to the wages mid-stream will result in uncertainty in bidding and contracting and put projects in jeopardy.

Continual change orders during a public works project would make it impossible to predict the actual cost of a project and, consequently, difficult to budget funds accurately. These additional cost pressures may impact the ability of a jurisdiction to move forward with a project. It would be challenging to predict how many determinations could occur during the project period and adequately plan for cost increases, which may put potential projects at risk.

For these reasons, we oppose AB 1198 (Haney) and respectfully request your "no" vote when this measure is heard before your committee. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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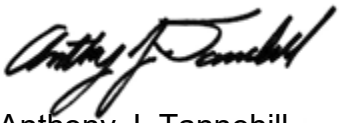

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cc: The Honorable Matt Haney, Member of the California State Assembly
Members of the Assembly Appropriations Committee
Irene Ho, Consultant, Assembly Appropriations Committee
Joe Shinstock, Consultant, Assembly Republican Caucus

January 16, 2026

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

RE: **AB 1383 (McKinnor) Public Employees' Retirement Benefits.**
OPPOSE *(As Amended April 11, 2025)*
To be heard in the Assembly Committee on Appropriations January 22, 2026

Dear Assembly Member Wicks,

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Association of California School Administrators (ACSA), and Urban Counties of California (UCC) write to inform you of our respectful opposition to Assembly Bill (AB) 1383. This bill would make several significant changes to public employees' retirement benefits, which would ultimately lead to increased pension liability for state and local agencies.

The Public Employees' Pension Reform Act (PEPRA) was passed in 2012, and most of its provisions went into effect Jan. 1, 2013. PEPRA was designed to address a wide range of issues involving public employee pensions and was a major step in helping local agencies better manage future pension costs and prevent the California Public Employees Retirement System from sliding into insolvency. AB 1383 would upend many of the reforms put in place in 2013 by PEPRA.

Specifically, this bill would:

- Increase the pensionable compensation cap;
- Reduce the retirement age for public safety from 57 to 55 prospectively;
- Add a 4th safety tier that is 3% @ 55, prospective and subject to bargaining;
- Allow local agencies to adjust their local formula in a prospective manner; and
- Permit authorized employee representatives to bargain with the employer over the employee share of payment for the normal cost.

While we recognize and appreciate the intent of the bill to support recruitment and retention of essential public safety professionals, the bill would impose increased state and local pension obligations and undo critical pension reform.

PEPRA has been in place since 2013, and we have had the opportunity to see its impact on pension funds and local agencies. For the state, schools, and public agencies in CalPERS, PEPRA has already led to $5.8 billion in savings. As years go by and the public sector force skews towards more new members, those savings will increase dramatically. Over the next ten years, PEPRA is expected to result in $26.5 billion in cost savings for CalPERS members[1]. This data does not include the public agencies that maintain their own pension system. PEPRA helps support budgetary stability which supports operational and workforce stability.

AB 1383 increases mandated costs without a way for public agencies to absorb them. The potential cost of this bill comes at a time of fiscal uncertainty. Much like the state, local agencies are facing budget challenges, as revenues are not keeping pace with the costs of delivering services or new mandates and are facing significant loss of resources and heightened responsibilities due to passage of H.R. 1. Some counties are currently considering significant budget cuts across all departments. AB 1383 would cause increased benefit costs and new cost pressures over the provisions that can be bargained, leading to serious cost increases for local government.

According to CalPERS, given the current discount rate of 6.8%, **AB 1383 is expected to increase the required contributions of employers and PEPRA members and increase the present value of future benefits (PVB) by $5.3 billion for all State, Schools, and Local Agency plans.** In addition to the change in PVB, CalPERS estimates that the **change to the accrued liability to be $370 million** for all State, Schools, and Local Agency plans. However, if the discount rate is reduced this year by the CalPERS Board, the impacts could be even more significant for local agencies. Additionally, CalPERS' analysis does not include any estimated costs for the provisions in AB 1383 that can be bargained, including a 3% at 55 benefit tier and adjustments to the share of normal costs between employers and employees—nor does it include an estimate of costs for the twenty county-operated pension systems.

As of June 30, 2025, the Public Employees Retirement Fund (PERF) was approximately 79% funded. If CalPERS misses its investment return mark of 6.8% on June 30th, local agencies in CalPERS and the State have to pay the difference. Again, this bill would compound costs for local governments and the State and do nothing to offset the costs.

California State Teachers' Retirement System (CalSTRS) has also conducted a fiscal analysis of AB 1383, and they have found that, "An estimated total of one-time and ongoing additional administrative costs in the range of **$1.7 million to $2.7 million** associated with the prospective increase in the PEPRA compensation cap…"

[1] CalPERS 2024 Annual Review of Funding Levels and Risk (published November 2024)

They go on to say, "To implement this bill, CalSTRS must either make significant technology changes to the pension administration system or manually perform complex multiple benefit calculations for the affected population." They estimate this would have a one-time cost in the range of **$1.5 million to $2.5 million** and to take about one year to complete. If they were to manually calculate benefits for the affected members, CalSTRS estimates that two additional analyst positions at a combined annual cost of approximately **$250,000** would be required.

In addition to the administrative costs, CalSTRS estimates that this bill would result in an increased risk of raising the employer normal cost in the future and it would increase the normal cost for certain PEPRA members. Finally, CalSTRS projects that AB 1383 may also increase the risk over time that CalSTRS may not be able to reach full funding by 2046 in line with the CalSTRS Funding Plan.

While this bill may be prospective, agencies have already been authorizing salary increases since the passage of PEPRA under the assumption that the cost of benefits would remain in line with current PEPRA law. The prospective costs would likely cause an immediate financial strain on any agency, especially those with a large number of PEPRA safety employees.

Local government decision makers and public agency department heads have been implementing innovative ways to try to boost recruitment and retention and would welcome additional state support and resources for these efforts. However, adding another unfunded mandate on public agencies will not solve the problem of retention and recruitment. It is critical that our pension policy offers sustainable retirement benefits to public agency employees while at the same time ensuring that public agencies have solid retirement benefits to attract and retain highly talented employees.

By increasing the cost of these benefits, AB 1383 would result in less money for salary increases, which could therefore harm future recruitment efforts. Additionally, the changes in this bill could result in labor unrest by furthering the equity issues between safety and non-safety employees. Additionally, according to CalPERS AB 1383 would increase the total normal cost for the affected plans and as a result PEPRA employee contribution rates increases would likely need to increase as well to reach half of the new normal cost.

Unfortunately, pension costs for many California public agencies continue to be a challenge, threatening the delivery of basic public services, compromising general fund budgets and, indeed, posing a long-term fiscal challenge to the State itself. That is why it is increasingly important that any change to the system be sustainable, fair to taxpayers and employees, and provide long-term financial stability. Any change to PEPRA must protect the fiscal integrity of public agencies and retirement for public employees.

Our organizations are committed to ensuring competitive benefits for public servants while maintaining the fiscal integrity of critical local services. However, as drafted, this

bill would not protect the fiscal integrity of public agencies and would send public agencies and our pension funds in the wrong direction.

For the reasons discussed above, the organizations listed below are respectfully opposed to AB 1383. The CalPERS and CalSTRS full fiscal analyses can be found attached. We look forward to continued conversations and collaboration with stakeholders on addressing pension sustainability and employee retention and recruitment. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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CC:

The Honorable Tina McKinnor, California State Assembly
Members and Consultants, Assembly Appropriations Committee

ACTUARIAL COST ANALYSIS
Assembly Bill 1383

I. Executive Summary

This is an actuarial cost analysis of Assembly Bill 1383.

This cost analysis was prepared by CalPERS as part of its assessment of AB 1383 in its current version as of April 11, 2025. If an amended version of AB1383 is passed, this cost analysis is subject to change. Further, this cost analysis does not attempt to address design, implementation, administration or legal issues that may exist. It only attempts to estimate the financial impact for employers whose pension plans are currently administered by CalPERS i.e. the State of California plans, the Schools Pool for non-teaching school employees and the more than 3,000 local agency plans.

The proposed changes lower the maximum retirement benefit factor age from age 57 to age 55 for all Safety PEPRA retirement formulas, and also redefines the compensation cap established under PEPRA for Miscellaneous and Safety PEPRA members. The new proposed PEPRA cap is increased to the Section 415(b)(1)(A) dollar limit (i.e. $280,000 in 2025). Per Section 7522.44 Prohibition of Retroactive Benefit Increases, these changes can only be applied prospectively. AB 1383 specifies that these changes would apply to service earned on or after January 1, 2026. All PEPRA benefits earned from January 1, 2013 through December 31, 2025 would be based on current benefit provisions.

As these changes will increase the total normal cost for the affected plans, it is likely that PEPRA employee contribution rates would need to increase to reach half of the new normal cost. However, this cost analysis only provides an estimate of the change in the total normal cost and does not split the cost between the employer and employee portions.

Overall, AB 1383 is expected to increase the required contributions of employers and PEPRA members and increase the present value of future benefits (PVB) by $5.3 billion for all State, Schools, and Local Agency plans. This disclosure models prospective only benefit enhancements. However, due to the nature of the amendment involved and CalPERS actuarial cost methods, there is also an impact to the portion of the PVB allocated to past service or accrued liability. We estimate the change to the accrued liability to be $370 million for all State, Schools, and Local Agency plans.

II. Valuation Basis

Valuation Date: 06/30/2023

Valuation Group:

State			Schools		Public Agencies	
X	Miscellaneous Tier 1	X	Schools	X	Miscellaneous	
X	Miscellaneous Tier 2		JRS I	X	Safety	
X	Industrial		JRS II	X	Fire	
X	Safety		LRS	X	Police	
X	POFF			X	County Peace Officers	
X	CHP			X	Lifeguards	
	Other (Specify)				Other (Specify)	

Data used: This cost analysis was based on the June 30, 2023 valuation.

Methods and Assumption: This cost analysis was based on the methods described in Appendix A of the June 30, 2023 actuarial valuation. Please see calpers.ca.gov for more details.

III. Results and Analysis

The proposed changes in AB 1383 are intended to improve retirement benefits for current active and future PEPRA members. It is expected that these improvements will increase costs to CalPERS employers and likely PEPRA employees in order to fund the improved benefits.

We have performed individual costings for the four following scenarios:

1. Increase to the PEPRA compensation limit for all plans to the Section 415(b)(1)(A) benefit
2. Improve benefit formula for PEPRA Safety members
    a. 2% at age 57 to 2% at age 55
    b. 2.5% at age 57 to 2.5% at age 55
    c. 2.7% at age 57 to 2.7% at age 55
3. Scenarios 1 and 2 combined, i.e. increase the compensation cap for all PEPRA members and improve benefit formula for PEPRA Safety members
4. In addition to scenario 3, improve benefit formula for PEPRA Safety members to 3% at age 55

As specified in AB 1383, the 3% at age 55 formula is a further improvement that can only be achieved through collective bargaining and would not become automatically effective January 1, 2026.

AB 1383 Cost Analysis
May 6, 2025

Scenario 1

AB 1383 proposes in Section 7522.10(c)(2) that the pensionable compensation limit will be increased to the dollar limit established by Section 415(b)(1)(A) of Title 26 of the United States Code which is currently $280,000 for calendar year 2025. For reference, the 2025 compensation cap for PEPRA members is $155,081 for members who participate in Social Security and $186,096 for members who do not participate in Social Security. Increasing the compensation cap ultimately increases the future retirement benefit for PEPRA members who earn more than the existing cap. An estimate of the impact of this change to the normal cost, the present value of benefits and accrued liability is in the tables below.

State & Schools Plans

Plan	Estimated Increase to Total Normal Cost for PEPRA Members Only	Estimated Increase to Total Normal Cost for Entire Plan	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
State Miscellaneous	0.64%	0.33%	$1,157.1	$93.6
State Industrial	0.44%	0.22%	43.7	1.9
State Safety	0.16%	0.05%	91.6	9.9
State Peace Officers & Firefighters	0.04%	0.02%	16.0	2.3
California Highway Patrol	3.51%	1.08%	215.7	11.7
Schools	0.19%	0.10%	368.7	51.4

Local Agency Pooled Plans

Plan	Estimated Increase to Total Normal Cost	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Miscellaneous Pool – 2% at age 62	0.43%	$174.5	$9.9
Safety Pool – 2% at age 57	0.63%	4.4	0.1
Safety Pool – 2.5% at age 57	1.40%	2.2	0.1
Safety Pool – 2.7% at age 57	1.82%	323.4	12.4

Scenario 1 (con't)

Local Agency Non-Pooled Plans (>100 active members)

Plan		Estimated Increase to Total Normal Cost for PEPRA Members Only	Estimated Increase to Total Normal Cost for Entire Plan	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Miscellaneous	Low	0.00%	0.00%	$0.0	$0.0
	Median	0.25%	0.11%	0.6	0.0
	High	2.15%	0.99%	621.4	48.4
Safety – 2% at age 57	Low	0.07%	0.00%	0.0	0.0
	Median	0.17%	0.04%	0.1	0.0
	High	0.75%	0.33%	3.9	0.3
Safety – 2.5% at age 57	Low				
	Median	2.77%	1.39%	9.1	0.5
	High				
Safety – 2.7% at age 57	Low	0.00%	0.00%	0.0	0.0
	Median	2.28%	0.86%	4.4	0.2
	High	5.38%	2.24%	90.4	4.9

The increase in the normal cost due to increasing the compensation limit would result in an increase to annual normal cost contributions of $303 million in the first year and increase the present value of future benefits by $4.8 billion.

There are plans where the estimated impact to the normal cost is zero. The reason for this is that there are plans which currently do not have any active members near or above the current PEPRA compensation limit and increasing the limit would not impact their future benefit.

Scenario 2

AB 1383 proposes in Section 7522.26 that on or after January 1, 2026 Safety Plans will offer new formulas which lower their current maximum benefit factor age from age 57 to age 55. Lowering the maximum benefit factor age means that employees will be able to retire with the same benefit factor two years earlier than they are currently able. The tables below provide an estimate of the increase to normal cost, present value of benefits and accrued liabilities associated with the formula change only.

State Plans

Plan	Estimated Increase to Total Normal Cost for PEPRA Members Only	Estimated Increase to Total Normal Cost for Entire Plan	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
State Safety	0.23%	0.12%	$37.3	$1.7
State Peace Officers & Firefighters	0.48%	0.21%	134.9	9.8
California Highway Patrol	0.80%	0.25%	39.6	2.3

Local Agency Pooled Plans

Plan	Estimated Increase to Total Normal Cost	Increase to Present Value of Future Normal Cost (millions)	Increase to Accrued Liabilities (millions)
Safety Pool – 2% at age 57	0.32%	$1.8	$0.1
Safety Pool – 2.5% at age 57	0.46%	0.5	0.0
Safety Pool – 2.7% at age 57	0.65%	85.5	4.8

Local Agency Non-Pooled Plans (>100 active members)

Plan		Estimated Increase to Total Normal Cost for PEPRA Members Only	Estimated Increase to Total Normal Cost for Entire Plan	Increase to Present Value of Future Normal Cost (millions)	Increase to Accrued Liabilities (millions)
Safety – 2% at age 57	Low	0.29%	0.00%	$0.0	$0.0
	Median	0.45%	0.20%	0.9	0.1
	High	0.51%	0.26%	1.8	0.2
Safety – 2.5% at age 57	Low				
	Median	0.54%	0.27%	1.5	0.1
	High				
Safety – 2.7% at age 57	Low	0.58%	0.15%	0.4	0.0
	Median	0.69%	0.28%	1.1	0.1
	High	0.79%	0.40%	12.6	1.0

The increase in the normal cost due to the formula change would result in an increase to annual normal cost contributions of $40 million in the first year and increase the present value of future benefits by $492 million.

Scenario 3

The tables below provide an estimate of the increased normal cost, present value of benefits and accrued liabilities associated with the formula change and increase in compensation cap.

State Plans

Plan	Estimated Increase to Total Normal Cost for PEPRA Members Only	Estimated Increase to Total Normal Cost for Entire Plan	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
State Safety	0.39%	0.18%	$128.9	$11.6
State Peace Officers & Firefighters	0.52%	0.23%	150.9	12.1
California Highway Patrol	4.31%	1.33%	255.3	14.0

Local Agency Pooled Plans

Plan	Estimated Increase to Total Normal Cost	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Safety Pool – 2% at age 57	0.94%	$6.2	$0.2
Safety Pool – 2.5% at age 57	1.86%	2.8	0.1
Safety Pool – 2.7% at age 57	2.48%	408.9	17.2

Local Agency Non-Pooled Plans (>100 active members)

Plan		Estimated Increase to Total Normal Cost for PEPRA Members Only	Estimated Increase to Total Normal Cost for Entire Plan	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Safety – 2% at age 57	Low	0.46%	0.00%	$0.0	$0.0
	Median	0.58%	0.30%	1.0	0.0
	High	1.20%	0.53%	5.7	0.4
Safety – 2.5% at age 57	Low				
	Median	3.31%	1.66%	10.6	0.7
	High				
Safety – 2.7% at age 57	Low	0.66%	0.17%	0.4	0.0
	Median	3.03%	1.13%	5.8	0.3
	High	6.04%	2.54%	100.2	5.8

The increase in the normal cost due to the increasing the compensation limit and improved benefit formula would result in an increase to annual normal cost contributions of $343 million in the first year and increase the present value of future benefits by $5.3 billion.

Scenario 4

AB 1383 further proposes that employers may increase their PEPRA formula to 3% at age 55 through individual agency collective bargaining. The tables below provide an estimate of the increased normal cost, present value of benefits and accrued liabilities associated with further increasing the retirement formula to 3% at age 55 for Safety Plans.

State Plans

Plan	Estimated Increase to Total Normal Cost for PEPRA Members Only	Estimated Increase to Total Normal Cost for Entire Plan	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
State Safety	9.75%	5.11%	$998	$108.8
State Peace Officers & Firefighters	4.62%	2.06%	1,020	96.5
California Highway Patrol	4.22%	1.30%	148	9.2

Local Agency Pooled Plans

Plan	Estimated Increase to Total Normal Cost	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Safety Pool – 2% at age 57	9.50%	$43.8	$2.3
Safety Pool – 2.5% at age 57	5.35%	5.6	0.4
Safety Pool – 2.7% at age 57	3.58%	437.2	31.0

Local Agency Non-Pooled Plans (>100 active members)

Plan		Estimated Increase to Total Normal Cost for PEPRA Members Only	Estimated Increase to Total Normal Cost for Entire Plan	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Safety – 2% at age 57	Low	7.21%	0.07%	$0.5	$0.0
	Median	7.45%	3.28%	11.2	1.0
	High	7.93%	3.75%	27.4	3.1
Safety – 2.5% at age 57	Low				
	Median	4.46%	2.26%	12.0	0.9
	High				
Safety – 2.7% at age 57	Low	3.09%	0.81%	1.9	0.2
	Median	3.56%	1.49%	5.6	0.4
	High	3.99%	2.03%	65.7	7.0

The increase in the normal cost due to the formula change to 3% at age 55 would result in an increase to annual normal cost contributions of $338 million in the first year and increase the present value of future benefits by $3.6 billion.

Notes:

- **All estimated costs were calculated using CalPERS existing actuarial assumptions and methods which are currently under review. Assumption modifications that are likely to occur would result in somewhat higher costs than those disclosed in this analysis in most cases.**
- In cases where the estimated impact to the normal cost is zero, this is due to the fact that these plans currently do not have any active members near or above the current PEPRA compensation limit and increasing the limit would not impact their future benefit. Actual costs could occur in these cases should compensation for future active members exceed the current compensation limit.
- Retirement assumptions do not exist for the new formulas. Retirement assumptions remained unchanged. To the extent these proposed changes alter retirement patterns, actual costs would vary from those provided.
- Altering the compensation limit only benefits employees who are currently above the cap or will potentially be above the cap in the future. However, all employees will share the cost of increasing the compensation limit through higher member contributions.
- Increasing the compensation limit will increase the pensionable payroll for employers and employees who are earning more than the current compensation limit. For employers, not only is the normal cost increasing, but so is the total payroll to which the normal cost rate will be applied. For members earning above the current compensation limit this means that a larger portion of their wages will be subject to member contributions. Additionally, the PEPRA member contribution rate will likely increase to reach half of the new normal cost.
- The impact to plans that have blended normal cost rates (a blend of normal cost rates for Classic and PEPRA members) will depend on the plan's composition of active Classic and PEPRA members. Plans with larger PEPRA populations may see a larger impact to their normal cost compared to plans with lower PEPRA populations.
- Future actuarial measurements may differ significantly from the current measurements presented in this document due to such factors as the following: plan experience differing from that anticipated by the economic or demographic assumptions; changes in economic or demographic assumptions; changes in actuarial policies; changes in plan provisions or applicable law; and differences between the required contributions determined by the valuation and the actual contributions made by the agency.
- This document is intended to provide preliminary cost estimates of Assembly Bill 1383. In addition, the scope of this analysis did not include examination of the impact of possible alternate future scenarios on results, such as variations in future investment returns, demographic experience, or changes in actuarial assumptions. Such information can be provided if requested and would likely provide a more complete assessment of the possible financial implications of this Bill.

Certification

The actuarial cost analysis of the impact of AB 1383 was based on data extracted from the my|CalPERS database as of June 30, 2023. The analysis has been performed in accordance with standards of practice prescribed by the Actuarial Standards Board, and the assumptions and methods are internally consistent and reasonable for this analysis. The undersigned include actuaries who satisfy the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States with regard to pensions.

Attachments

Attachment 1 – Sensitivity Analysis

NINA RAMSEY, ASA, MAAA
Senior Actuary
CalPERS Actuarial Office

DAVID CLEMENT, ASA, MAAA
Supervising Actuary
CalPERS Actuarial Office

SCOTT TERANDO, ASA, EA, MAAA, FCA, CFA
Chief Actuary
CalPERS Actuarial Office

GLOSSARY OF ACTUARIAL TERMS

Accrued Liability *(Actuarial Accrued Liability)***:** The portion of the Present Value of Benefits allocated to prior years. Based on CalPERS funding policies, the accrued liability is the target level of assets on any valuation date.

Actuarial Assumptions: Assumptions made about certain events that will affect pension costs. Assumptions generally can be broken down into two categories: demographic and economic. Demographic assumptions include such things as mortality, disability, and retirement rates. Economic assumptions include discount rate, salary growth and inflation.

Actuarial Methods: Procedures employed by actuaries to achieve certain funding goals of a pension plan. Actuarial methods include cost method, amortization policy and asset valuation method.

Actuarial Valuation: The determination as of a valuation date of the Normal Cost, Accrued Liability, and related actuarial present values for a pension plan. These valuations are performed annually or when an employer is contemplating a change to their plan provisions.

Amortization Bases: Separate payment schedules for different portions of the Unfunded Accrued Liability. The total Unfunded Accrued Liability of a rate plan can be segregated by cause. The impact of such individual causes on the UAL are quantified at the time of their occurrence, resulting in new amortization bases. Each base is separately amortized and paid for over a specific period of time. Generally, in an actuarial valuation, the separate bases consist of changes in UAL due to contract amendments, actuarial assumption changes, method changes, and/or gains and losses.

Amortization Period: The number of years required to pay off an Amortization Base.

Classic Member (under PEPRA): A classic member is a member who joined CalPERS prior to January 1, 2013, and who is not defined as a new member under PEPRA. (See definition of new member below.)

Discount Rate: This is the rate used to discount the expected future benefit payments to the valuation date to determine the Projected Value of Benefits. The discount rate is based on the assumed long-term rate of return on plan assets, net of investment and administrative expenses. This rate is called the "actuarial interest rate" in Section 20014 of the California Public Employees' Retirement Law.

Entry Age: The earliest age at which a plan member begins to accrue benefits under a defined benefit pension plan. In most cases, this is the age of the member on their date of hire.

Entry Age Actuarial Cost Method: An actuarial cost method designed to fund a member's total plan benefit in a level manner over the course of his or her career. This method yields a total normal cost rate, expressed as a percentage of payroll, which is designed to remain level throughout the member's career.

Fresh Start: A Fresh Start is when multiple Amortization Bases are combined into a single base and amortized over a new Amortization Period.

Funded Ratio: Defined as Market Value of Assets divided by Accrued Liability. It is a measure of how well funded a rate plan is. A ratio greater than 100% means the rate plan has more assets than the target established by CalPERS funding policies on the valuation date and the employer need only contribute the Normal Cost. A ratio less than 100% means assets are less than the funding target and contributions in addition to Normal Cost are required.

GASB 68: Statement No. 68 of the Governmental Accounting Standards Board, the accounting standard governing a state or local governmental employer's accounting and financial reporting for pensions.

New Member (under PEPRA): A new member is an individual who becomes a member of a public retirement system in the State of California for the first time on or after January 1, 2013, was not a member of another public retirement system prior to that date and is not subject to reciprocity with another public retirement system.

Normal Cost: The portion of the Present Value of Benefits allocated to the upcoming fiscal year for active employees. The normal cost plus the required amortization of the UAL, if any, make up the required contributions.

Pension Actuary: A business professional proficient in mathematics and statistics who performs the calculations necessary to properly fund a pension plan and allow the plan sponsor to disclose its liabilities. A pension actuary must satisfy the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States regarding pensions.

PEPRA: The California Public Employees' Pension Reform Act of 2013.

Present Value of Benefits (PVB): The total dollars needed as of the valuation date to fund all benefits earned in the past and expected to be earned in the future for *current* members.

Unfunded Accrued Liability (UAL): The Accrued Liability minus the Market Value of Assets. If the UAL for a rate plan is positive, the employer is required to make contributions in excess of the Normal Cost. A UAL that is negative is also called the surplus.

Sensitivity Analysis

Discount Rate Sensitivity

The discount rate assumption is calculated as the sum of the assumed real rate of return and the assumed annual price inflation, currently 4.50% and 2.30%, respectively. Changing either the price inflation assumption or the real rate of return assumption will change the discount rate. The sensitivity of the valuation results to the discount rate assumption depends on which component of the discount rate is changed. Shown below are various valuation results as of June 30, 2023 modified to reflect the estimated impact of AB 1383, and provided under alternate discount rates.. Results are shown using the current discount rate of 6.8% as well as alternate discount rates of 5.8% and 7.8%. The rates of 5.8% and 7.8% were selected since they illustrate the impact of a 1.0% increase or decrease to the 6.8% assumption.

The following tables indicate the sensitivity of key valuation results to changes in the discount rate.

	Estimated Valuation Results Reflecting AB 1383		
As of June 30, 2023	**1% Lower Real Return Rate (millions)**	**Current Assumptions (millions)**	**1% Higher Real Return Rate (millions)**
Discount Rate	**5.8%**	**6.8%**	**7.8%**
Price Inflation	2.3%	2.3%	2.3%
Real Rate of Return	**3.5%**	**4.5%**	**5.5%**
State Miscellaneous			
a) Total Normal Cost	21.5%	17.8%	14.1%
b) PVB	189,642.8	167,902.3	146,161.8
c) AL	156,905.9	142,107.6	127,309.3
State Industrial			
a) Total Normal Cost	22.6%	18.9%	15.2%
b) PVB	8,818.2	7,717.4	6,616.6
c) AL	6,633.0	6,221.3	5,509.6
State Safety			
a) Total Normal Cost	27.5%	23.3%	19.1%
b) PVB	26,415.0	23,252.3	20,089.6
c) AL	20,581.0	18,535.6	16,490.2
State Peace Officers & Firefighters			
a) Total Normal Cost	37.4%	30.9%	24.4%
b) PVB	85,845.8	75,505.9	65,166.0
c) AL	71,202.5	63,928.1	56,653.7
California Highway Patrol			
a) Total Normal Cost	40.9%	33.4%	25.9%
b) PVB	23,240.7	20,426.4	17,612.1
c) AL	19,470.2	17,469.9	15,469.6
Schools			
a) Total Normal Cost	20.6%	17.2%	13.8%
b) PVB	171,960.4	151,251.1	130,541.8
c) AL	138,956.2	124,975.4	110,994.6

As of June 30, 2023	1% Lower Real Return Rate (millions)	Current Assumptions (millions)	1% Higher Real Return Rate (millions)
Discount Rate	**5.8%**	**6.8%**	**7.8%**
Price Inflation	2.3%	2.3%	2.3%
Real Rate of Return	**3.5%**	**4.5%**	**5.5%**
Miscellaneous Pool – 2% at age 62			
a) Total Normal Cost	19.7%	16.5%	13.3%
b) PVB	5,767.5	4,680.5	3,593.5
c) AL	1,874.0	1,593.8	1,313.6
Safety Pool – 2% at age 57			
a) Total Normal Cost	31.1%	26.4%	21.7%
b) PVB	191.3	153.8	116.3
c) AL	44.4	37.5	30.6
Safety Pool – 2.5% at age 57			
a) Total Normal Cost	32.2%	26.5%	20.8%
b) PVB	46.9	36.8	26.7
c) AL	9.8	8.1	6.4
Safety Pool – 2.7% at age 57			
a) Total Normal Cost	37.3%	31.1%	24.9%
b) PVB	5,894.8	4,709.6	3,524.4
c) AL	1,370.4	1,155.4	940.4
Miscellaneous Non-Pooled Plans			
a) Total Normal Cost	22.1%	18.4%	14.7%
b) PVB	197,817.4	174,629.2	151,441.0
c) AL	163,534.2	147,427.8	131,321.4
Safety Non-Pooled Plans 2% at age 57			
a) Total Normal Cost	35.8%	29.8%	23.8%
b) PVB	3,584.7	3,184.0	2,783.3
c) AL	3,107.0	2,801.9	2,496.8
Safety Non-Pooled Plans 2.5% at age 57			
a) Total Normal Cost	40.8%	33.7%	26.6%
b) PVB	1,221.1	1,084.0	946.9
c) AL	1,072.5	967.1	861.7
Safety Non-Pooled Plans 2.7% at age 57			
a) Total Normal Cost	39.8%	33.0%	26.2%
b) PVB	97,578.5	85,830.9	74,083.3
c) AL	80,443.3	72,306.4	64,169.5

Mortality Rate Sensitivity

The following tables look at the change in the June 30, 2023 plan costs under two different longevity scenarios, namely assuming post-retirement rates of mortality are 10% lower or 10% higher than our current mortality assumption adopted in 2023. This type of analysis highlights the impact on the plan of a change in the mortality assumption.

The following tables indicate the sensitivity of key valuation results to changes in the post-retirement mortality rates.

	Estimated Valuation Results Reflecting AB 1383		
As of June 30, 2023	**10% Lower Mortality Rates (millions)**	**Current Assumptions**	**10% Higher Mortality Rates (millions)**
State Miscellaneous			
a) Total Normal Cost	18.1%	17.8%	17.5%
b) PVB	171,355.5	167,902.3	164,449.1
c) AL	145,172.5	142,107.6	139,042.7
State Industrial			
a) Total Normal Cost	19.2%	18.9%	18.6%
b) PVB	7,857.4	7,717.4	7,577.4
c) AL	6,339.9	6,221.3	6,102.7
State Safety			
a) Total Normal Cost	23.6%	23.3%	23.0%
b) PVB	23,659.3	23,252.3	22,845.2
c) AL	18,882.3	18,535.6	18,188.9
State Peace Officers & Firefighters			
a) Total Normal Cost	31.3%	30.9%	30.5%
b) PVB	76,598.0	75,505.9	74,413.8
c) AL	64,901.6	63,928.1	62,954.6
California Highway Patrol			
a) Total Normal Cost	33.7%	33.4%	33.1%
b) PVB	20,720.1	20,426.4	20,132.7
c) AL	17,733.1	17,469.9	17,206.7
Schools			
a) Total Normal Cost	17.4%	17.2%	17.0%
b) PVB	154,185.6	151,251.1	148,316.6
c) AL	127,535.4	124,975.4	122,415.4
Miscellaneous Pool – 2% at age 62			
a) Total Normal Cost	16.8%	16.5%	16.2%
b) PVB	4,755.5	4,680.5	4,605.5
c) AL	1,621.3	1,593.8	1,566.3
Safety Pool – 2% at age 57			
a) Total Normal Cost	26.7%	26.4%	26.1%
b) PVB	155.9	153.8	151.7
c) AL	38.1	37.5	36.9
Safety Pool – 2.5% at age 57			
a) Total Normal Cost	26.8%	26.5%	26.2%
b) PVB	37.3	36.8	36.3
c) AL	8.2	8.1	8.0

As of June 30, 2023	10% Lower Mortality Rates (millions)	Current Assumptions	10% Higher Mortality Rates (millions)
Safety Pool – 2.7% at age 57			
a) Total Normal Cost	31.5%	31.1%	30.7%
b) PVB	4,766.6	4,709.6	4,652.6
c) AL	1,170.1	1,155.4	1,140.7
Miscellaneous Non-Pooled Plans			
a) Total Normal Cost	18.7%	18.4%	18.1%
b) PVB	177,902.4	174,629.2	171,356.0
c) AL	150,306.6	147,427.8	144,549.0
Safety Non-Pooled Plans 2% at age 57			
a) Total Normal Cost	30.1%	29.8%	29.5%
b) PVB	3,236.9	3,184.0	3,131.1
c) AL	2,850.2	2,801.9	2,753.6
Safety Non-Pooled Plans 2.5% at age 57			
a) Total Normal Cost	34.1%	33.7%	33.3%
b) PVB	1,100.9	1,084.0	1,067.1
c) AL	982.9	967.1	951.3
Safety Non-Pooled Plans 2.7% at age 57			
a) Total Normal Cost	33.4%	33.0%	32.6%
b) PVB	87,130.1	85,830.9	84,531.7
c) AL	73,459.2	72,306.4	71,153.6

Funded Status – Low Default Risk Basis

Actuarial Standard of Practice (ASOP) No. 4, *Measuring Pension Obligations and Determining Pension Plan Costs or Contributions*, requires the disclosure of a low-default-risk obligation measure (LDROM) of benefit costs accrued as of the valuation date using a discount rate based on the yields of high quality fixed income securities with cash flows that replicate expected benefit payments. Conceptually, this measure represents the level at which financial markets would value the accrued plan costs, and would be approximately equal to the cost of a portfolio of low-default-risk bonds with similar financial characteristics to accrued plan costs.

As permitted in ASOP No. 4, the Actuarial Office uses the Entry Age Actuarial Cost Method to calculate the LDROM. This methodology is in line with the measure of "benefit entitlements" calculated by the Bureau of Economic Analysis and used by the Federal Reserve to report the indebtedness due to pensions of plan sponsors and, conversely, the household wealth due to pensions of plan members.

As shown below, the discount rate used for the LDROM is 4.82%, which is the Standard FTSE Pension Liability Index[1] discount rate as of June 30, 2023, net of assumed administrative expenses

	Estimated Valuation Results Reflecting AB 1383	
As of June 30, 2023	**Current Assumptions (millions)**	**LDROM Discount Rate (millions)**
Discount Rate	**6.8%**	**4.82%**
State Miscellaneous		
PVB	167,902.4	231,140.5
AL	142,107.6	180,787.0
State Industrial		
PVB	7,717.4	10,988.5
AL	6,221.3	8,135.3
State Safety		
PVB	23,252.3	32,489.9
AL	18,535.6	23,993.7
State Peace Officers & Firefighters		
PVB	75,505.9	105,970.3
AL	63,928.1	83,611.1
California Highway Patrol		
PVB	20,426.4	28,699.5
AL	17,469.9	22,886.2
Schools		
PVB	151,251.1	212,347.4
AL	124,975.4	162,113.4
Miscellaneous Pool – 2% at age 62		
PVB	4,680.4	8,370.7
AL	1,593.8	2,414.2
Safety Pool – 2% at age 57		
PVB	153.8	283.7
AL	37.5	58.0
Safety Pool – 2.5% at age 57		
PVB	36.7	72.9
AL	8.1	13.3

As of June 30, 2023	Current Assumptions (millions)	LDROM Discount Rate (millions)
Discount Rate	**6.8%**	**4.82%**
Safety Pool – 2.7% at age 57		
PVB	4,709.6	8,836.5
AL	1,155.4	1,792.1
Miscellaneous Non-Pooled Plans		
PVB	174,629.2	242,331.5
AL	147,427.8	190,240.2
Safety Non-Pooled Plans 2% at age 57		
PVB	3,184.0	4,324.7
AL	2,801.9	3,615.8
Safety Non-Pooled Plans 2.5% at age 57		
PVB	1,084.0	1,483.4
AL	967.1	1,252.5
Safety Non-Pooled Plans 2.7% at age 57		
PVB	85,830.9	120,532.1
AL	72,306.4	94,280.5

AB 1383 (McKinnor), as amended April 11, 2025
Fiscal Impact

Program Costs/Savings – The provisions of AB 1383 are prospective, so the bill does not directly affect CalSTRS' unfunded actuarial obligation for the Defined Benefit (DB) Program. However, in order to fully fund future benefits attributable to a new PEPRA compensation cap of approximately $280,000, as prescribed in the bill, the normal cost of the CalSTRS 2% at 62 member benefit would increase by 0.900%. It is possible that the language in AB 1383 allows for the existing cap to continue to apply to 2% at 62 members. If that is clarified, there would be no increase in the normal cost, and the administrative complexity and associated costs described below would be removed.

2% at 62 Members – When combined with other normal cost increases since the last change in the 2% at 62 member contribution rate in 2018, the additional costs would be high enough to trigger an increase under PEPRA of 0.500% in the 2% at 62 member contribution rate, raising it to 10.705%. The impact on the normal cost of the 2% at 62 member benefit and contribution rate takes into account the number of total members who are now and will in the future be earning more than the existing cap and would, therefore, receive an increased benefit under the bill. CalSTRS looks at its entire population to estimate the future impact. While there are currently about 9,000 members who earn more than the existing cap, or about 2% of CalSTRS active membership, an additional 5% to 10% of CalSTRS active members are likely going to exceed the cap before retirement.

Employers – The current employer contribution rate of 19.1% would remain the same at this time. The increased normal cost of the 2% at 62 member benefit would increase the risk of raising the employer contribution rate in the future. It may also increase the risk over time that CalSTRS may not be able to reach full funding by 2046 in line with the CalSTRS Funding Plan. Moreover, the proposed increase in the compensation cap would require additional employer contributions for any compensation above the current cap that would be creditable to the DB Program.

State – There would be no immediate impact on the state contribution rate as the proposed change in the contribution cap is prospective. The proposed increase in the compensation cap would require additional state contributions for any compensation above the current cap that would be creditable to the DB Program.

In regard to all DB Program members and Cash Balance Benefit Program participants whose exclusive representatives bargain for their employer to pay a portion of their member or participant contributions, there would be no direct impact to CalSTRS. Those members or participants would experience a lower deduction from their paychecks for contributions, and those employers would experience increased costs associated with paying for a portion of the member or participant contributions.

Administrative Costs/Savings – An estimated total of one-time and ongoing additional administrative costs in the range of $1.7 million to $2.7 million associated with the prospective increase in the PEPRA compensation cap, which necessitates creating and administering separate retirement benefit calculations for 2% at 62 members with a final compensation exceeding the existing cap after the bill takes effect. This change represents a major departure from CalSTRS' long-time practice of having one benefit formula for each membership group.

To implement this bill, CalSTRS must either make significant technology changes to the pension administration system or manually perform complex multiple benefit calculations for the affected population. While an automated solution is preferable from an administrative standpoint for accuracy and efficiency, this technology change to CalSTRS' pension administration system is estimated to have a one-time cost in the range of $1.5 million to $2.5 million and to take about one year to complete. This estimate does not include any additional costs, which are unknown, but believed to be substantial, that may be associated with delaying the implementation of CalSTRS' new pension administration system to implement AB 1383 as quickly as possible. However, given the short window to implement multiple retirement calculations and CalSTRS' commitment to implement the new pension administration system in fall 2025, an automated solution is unlikely to be available when the bill takes effect, and it is unknown when CalSTRS would have capacity to implement the change.

To manually calculate benefits for the affected members, CalSTRS estimates that two additional analyst positions at a combined annual cost of approximately $250,000 would be required to perform and review highly complex manual benefit calculations and related transactions, monitor members potentially affected by the new cap, and respond to increased member inquiries about the multiple benefit calculations. As of June 30, 2024, CalSTRS has about 83 vested 2% at 62 members with a compensation earnable close to or over the existing cap that are eligible to retire (age 55 or older) when the bill takes effect. CalSTRS anticipates the number of members affected by the bill to grow over time, thereby increasing the manual workload until an automated solution is in place. Minor and absorbable one-time costs are also anticipated for updating training, communications and procedures.

January 15, 2026

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

RE: Assembly Bill 1439 (Garcia) Public retirement systems: development projects: labor standards.
As amended March 24, 2025 – OPPOSE
To be heard in the Assembly Committee on Appropriations January 22, 2026

Dear Chair Wicks,

The California Special Districts Association (CSDA), California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (CalCities), and California Association of School Business Officials (CASBO) must respectfully oppose Assembly Bill 1439 (Garcia) because it could substantially limit investment options for CalPERS and county retirement systems and ultimately raise annual contributions costs for public employers, including the state, local agencies, and schools, as well as the public workforce.

While our state's public pension systems have made meaningful progress towards improving funded status – due to prudent investments, benefit reform efforts, and state investment – the fiscal health of those systems remains vulnerable. As of the end of the 2024-25 fiscal year the funded status for California's two largest public pension systems, CalPERS and CalSTRS, fell below 80%, a funded level that S&P Global Ratings has characterized[1] as "elevated unfunded obligations." Legislation that compromises pension fund investments risks long-term funding commitments made to the public workforce,

[1] S&P Global, Credit FAQ: Quick Start Guide to S&P Global Ratings' Approach to U.S. State and Local Government Pensions; https://www.spglobal.com/ratings/en/regulatory/article/190513-credit-faq-quick-start-guide-to-s-p-global-ratings-approach-to-u-s-state-and-local-government-pensions-s10981905

including legislation[2] that committed the State to a generational funding plan for CalSTRS and the teachers whose retirement security depends upon the fiscal health of the system.

AB 1439 prohibits all public pension systems from making any new or additional investment in a development project that does not include specified "labor standards protections," defined by law, or from providing financing for those projects. The bill would apply these prohibitions to any investment made by CalPERS, CalSTRS, or the state's locally-governed pension systems, including the twenty independent county retirement systems (often referred to as '37 act systems). Because the bill would place limits on projects for which the pension systems "provide financing," the bill could apply to effectively any investment class, including passive investments like index funds or fixed income assets. Those assets, by nature, invest broadly in a vast array of stocks and bond funds, seeking diversification and low fees.

As of the end of the 2024-25 fiscal year, public pension systems in California managed approximately $1.1 trillion in total assets. These funds are needed to pay retirement benefits to California's public employees: teachers, principals, firefighters, law enforcement, sanitation workers, and front-line service providers upholding the social safety net, to name just some categories of our public workforce. While public employees and employers both contribute significantly to these pension assets, the majority of a pension fund's assets are made through investment returns.

AB 1439 will establish a *de facto* divestment mechanism for a broad swath of public pension investments. While AB 1439 nominally applies only to new investments, pension funds continually grow their stake in existing funds and individual investments – and often sell and repurchase investments to take advantage of market conditions. As funds grow, continual investments must be made to keep pace with contractual obligations, investment policies, and the prudent needs of the fund itself.

Divestment makes achieving the returns needed to maintain a plan's health more challenging. According to a CalPERS Publication entitled Divestment is Political, CalPERS' Fiduciary Duty Is Not, divestment increases investment risk, increases cost volatility, and loses money. With contribution rates hitting public employee wallets and stretching employer budgets thin, it is not prudent to take action that would further increase employer contributions and put continued strain on local budgets. Due to the anticipated financial costs associated with divestment and bills like AB 1439, our agencies oppose efforts that divert public pension systems from their duty to their members, including divestment of

[2] AB 1469 (Chapter 47, Statutes of 2014)

assets to achieve political objectives if the divestment would have a negative impact on the overall health of the fund.

In order to improve the funded status of our employees' pension funds and avoid financial shock to our systems and their members, it is critical that public pension systems have healthy investment returns. To make matters more concerning, we do not yet know the extent to which AB 1439 could impact public pension funds. Currently, CalPERS is conducting a market study to evaluate potential impacts of adopting the standards proposed in AB 1439. One thing is certain: as collective investors of more than $1 trillion, the last thing public pension systems need is policy that severely constrains the assets in which they may invest.

Fundamentally, we do not believe it is appropriate to undermine the plenary authority of our public pension systems, particularly at the expense of the financial security of our workforce or public agencies. As noted in the bill analysis in the Assembly Public Employment and Retirement Committee, the legislature has limited constitutional authority to impose conditions on how public pension funds make investment decisions. AB 1439 represents both a direct threat to the fiscal health of our pension systems and a tipping point down a slippery slope of political interference in the retirement assets earned by California's public employees.

California's public workforce deserves the retirement benefits they have been promised. Bills that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers.

For these reasons, our organizations must respectfully oppose AB 1439. Please feel free to contact us if you have any questions.

Sincerely,

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CC: The Honorable Robert Garcia
Members, Assembly Committee on Appropriations
Aaron Heredia, Principal Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

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January 6, 2026

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

RE: AB 763 (Ward) Timber harvesting: waste discharge requirements

Dear Chair Connolly,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we support AB 763 (Ward).

This bill would add a straightforward, common-sense provision to the Water Code requiring a Regional Water Quality Control Board (Regional Water Board) to act on requests for coverage under general waste discharge requirements for timber harvest, whether to approve or deny timber management activities.

California's counties are a major wildfire stakeholder, whether the policy matter at hand is disaster response and mitigation, or, in this case, planning and preparation to prevent wildfires. Fuels management is a key aspect of wildfire resilience, and we support efforts to responsibly streamline and encourage activities that result in healthier forests.

This bill would reduce regulatory uncertainty and delays for projects that utilize the state's pre-existing Timber Harvesting Plan process and help to expedite needed projects without sacrificing necessary environmental oversight. It is a priority for CSAC that any unnecessary barriers to expeditious forest management efforts be removed, in order to minimize the risk of wildfire to Californians as much as possible. AB 763 is a step in the right direction.

Should you have any questions regarding our position, please do not hesitate to contact me at 916-650-8113 or cdelgado@counties.org.

Sincerely,

Charles Delgado

Legislative Advocate

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California State Association of Counties

cc: The Honorable Christopher M. Ward, Member of the California State Assembly
Members of the Assembly Environmental Safety and Toxic Materials Committee
Josh Tooker, Chief Consultant, Assembly Environmental Safety and Toxic Materials Committee

January 7, 2026

The Honorable Matt Haney
Chair, Assembly Committee on Housing and Community Development
1020 N Street, Room 156
Sacramento, CA 95814

RE: **AB 874 (Ávila Farías) Mitigation Fee Act: development impact fees: qualified residential ownership and qualified rental projects.**
Notice of OPPOSITION *(As of January 5, 2026)*

Dear Chair Haney,

The League of California Cities (Cal Cities), California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), and the California Association of Recreation and Park Districts (CARPD) must regretfully **oppose Assembly Bill 874 (Ávila Farías**), which would require local agencies to adopt a 30- to 55-year fee-deferral loan program for 100% affordable housing projects or to reduce mitigation fees to zero.

AB 874 amends the Mitigation Fee Act, which governs how local agencies collect development-related fees to fund essential infrastructure such as water, sewer, fire protection, parks, flood control, and libraries. These fees are strictly cost-recovery tools—not revenue sources—and they enable the infrastructure necessary for new housing and economic development. Local governments already face limited budgets, and under this bill, they would be required to front infrastructure costs with no guarantees of repayment or of receiving the funds until decades later.

Local governments are still working to comply with SB 937 (2024), which took effect this year. Under this new law, local governments must defer impact fees until issuance of the certificate of occupancy for 100% affordable housing projects. Instead of allowing local governments time to implement SB 937 fully, AB 874 would go further than the existing law. AB 874 would limit local governments' ability to raise these necessary financial resources for 30 to 55 years, forcing local agencies to act

as long-term lenders without adequate reserves, financial capacity, or certainty that the loan will be repaid. It would also require local governments to cover the upfront costs of infrastructure improvements necessary for quality of life, health, and safety in residential development, while operating with limited budgets and limited discretionary funds.

Our organizations recognize the state's affordable housing crisis and strongly support the development of affordable and low-income housing in our communities. In fact, local governments are already at the forefront of advancing 100% affordable housing through local ordinances and programs. However, these programs vary based on local fiscal realities. This measure would undermine the good work local governments are already doing by creating a one-size-fits-all approach to development impact fees.

The proponents cite a few local ordinances as examples of how a loan-fee deferral program could work; however, upon review, there is a clear difference between how the agencies voluntarily implement such programs and what is proposed in AB 874. Specifically, the programs typically include a process for the local agency to collaborate with the developer to determine repayment terms, minimum monthly repayments, interest rates, and which projects qualify. This measure would ignore these efforts and create a one-size-fits-all fee-deferral program without regard for the efforts already undertaken locally. A one-size-fits-all statewide mandate disregards the vast diversity among local jurisdictions, particularly in their fiscal capacity to defer development impact fees.

Furthermore, this bill undermines local governments' ability to partner with the private sector to responsibly address the housing crisis by ensuring high-quality public infrastructure for new development. By mandating fee deferrals, the bill effectively turns local agencies—many with no experience or capacity to lend to private developers—into banks, shifting financial risk from developers to local taxpayers and impairing the timely construction of essential infrastructure.

Development impact fees, which are based on required nexus studies and are not arbitrarily set, are a primary and often sole funding source for some local governments that lack broad revenue streams and therefore cannot build or improve facilities without these funds. Deferring them at best delays, or in some cases could prevent the infrastructure needed to support new residents. Addressing California's housing crisis requires pairing housing production with infrastructure solutions, because communities cannot be healthy, equitable, or livable without the public facilities that mitigation fees are designed to provide. A better policy approach would incentivize, rather than mandate, voluntary fee deferral programs by establishing a revolving fund or by offering other financial tools to help local agencies cover upfront infrastructure costs. Many jurisdictions cannot absorb decades-long deferrals, given constrained general funds and competing service demands.

For these reasons, Cal Cities, CSAC, UCC, RCRC, CSDA, and CARPD regretfully must oppose **AB 874 (Ávila Farías)**. 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, Anthony Tannehill (CSDA) at anthonyt@csda.net, Mark Neuburger (CSAC) at mneuburger@counties.org, or Ethan Nagler at enagler@publicpolicygroup.com.

Sincerely,

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Legislative Advocate, Cal Cities

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Senior Policy Advocate, RCRC

Mark Neuburger
Legislative Advocate, CSAC

Christopher Lee
Legislative Advocate, UCC

Anthony Tannehill
Legislative Representative, CSDA

Ethan Nagler
Legislative Representative, CARPD

Cc: The Honorable Anamarie Ávila Farías
Members, Assembly Committee on Housing and Community Development
Dori Ganetsos, Senior Consultant, Assembly Committee on Housing and Community Development
Sarah Haynes, Associate Consultant, Assembly Republican Caucus

January 8, 2026

The Honorable Tina McKinnor
Chair, Assembly Public Employment and Retirement Committee
1020 N St., Room 153
Sacramento, CA 95814

RE: Assembly Bill 1439 (Garcia) Public retirement systems: development projects: labor standards.
As amended March 24, 2025 – OPPOSE
To be heard in the Assembly Committee on Public Employment and Retirement January 14, 2026

Dear Chair McKinnor:

The California Special Districts Association (CSDA), California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (CalCities), and California Association of School Business Officials (CASBO) must respectfully oppose Assembly Bill 1439 (Garcia) because it could substantially limit investment options for CalPERS and county retirement systems and ultimately raise annual contributions costs for both employers, including special districts and counties, and their employees.

AB 1439 prohibits all public pension systems from making any new or additional investment in a development project that does not include specified "labor standards protections," defined by law, or to provide financing for those projects. The bill would apply these prohibitions to any investment made by CalPERS, CalSTRS, or any of the state's twenty independent county retirement systems (often referred to as '37 act systems). Because the bill would place limits on projects for which the pension systems "provide financing," the bill could, apply to effectively any investment class, including passive investments like index funds or fixed income assets. Those assets, by nature, invest broadly in a vast array of stocks and bond funds, seeking diversification and low fees.

As of the end of the 2024-25 fiscal year, public pension systems in California managed approximately $1.1 trillion in total assets. These funds are needed to pay retirement benefits to California's public employees: teachers, principals, firefighters, law enforcement, sanitation workers, and front-line service providers upholding the social safety net, to name just some categories of our public workforce. While public employees and employers both contribute significantly to these pension assets, the majority of a pension fund's assets are made through investment returns.

California's public workforce deserves the retirement benefits they have been promised. Bills that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers.

AB 1439 will establish a *de facto* divestment mechanism for a broad swath of public pension investments. While AB 1439 nominally applies only to new investments, pension funds continually grow their stake in existing funds and individual investments – and often sell and repurchase investments to take advantage of market conditions. As funds grow, continual investments must be made to keep pace with investment policies and the prudent needs of the fund itself.

Divestment makes achieving the returns needed to maintain a plan's health more challenging. According to a CalPERS Publication entitled Divestment is Political, CalPERS' Fiduciary Duty Is Not, divestment increases investment risk, increases cost volatility, and loses money. With contribution rates hitting public employee wallets and stretching employer budgets thin, it is not prudent to take action that would further increase employer contributions and put continued strain on local budgets. Due to the anticipated financial costs associated with divestment and bills like AB 1439, our agencies oppose efforts that divert public pension systems from their duty to their members, including divestment of assets to achieve political objectives if the divestment would have a negative impact on the overall health of the fund.

In order to improve the funded status of our employees' pension funds and avoid financial shock to our systems and their members, it is critical that public pension systems have healthy investment returns. To make matters more concerning, we do not yet know the extent to which AB 1439 could impact public pension funds. Currently, CalPERS is conducting a market study to evaluate potential impacts of adopting the standards proposed in AB 1439. One thing is certain: as collective investors of more than $1 trillion, the last thing public pension systems need is policy that severely constrains the assets in which they may invest.

Fundamentally, we do not believe it is appropriate to undermine the plenary authority of our public pension systems, particularly at the expense of the financial security of our workforce or public agencies.

For these reasons, our organizations must respectfully oppose AB 1439. Please feel free to contact us if you have any questions.

Sincerely,

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CC: The Honorable Robert Garcia
Members, Assembly Public Employment and Retirement Committee
Michael Bolden, Chief Consultant, Assembly Public Employment and Retirement Committee
Lauren Prichard, Policy Consultant, Assembly Republican Caucus

January 8, 2026

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

RE: Senate Bill 222 (Wiener) – OPPOSE
As Amended January 5, 2026

Dear Chair Durazo:

On behalf of the Rural County Representatives of California and the California State Association of Counties, we respectfully oppose Senate Bill 222 (Wiener), which seeks to adopt an overly prescriptive mandate over heating, ventilation, and air conditioning (HVAC) systems that removes essential local permitting authority and threatens public safety.

SB 222 declares residential heat pump permitting to be a matter of statewide concern without any supporting study, report, or evidentiary hearing to justify overriding local authority. This broad preemption disregards the reality that cities and counties across California face vastly different conditions, including wildfire exposure, seismic risk, housing stock, weather considerations, electrical capacity, and population density.

Local permitting is not a barrier to electrification; it is the mechanism through which local governments ensure installations are safe, code-compliant, and appropriate for site-specific conditions. By imposing a state-mandated permitting framework for HVAC systems, SB 222 establishes a troubling precedent for future state intrusion into local building, zoning, and land-use authority.

The bill also raises serious public safety and oversight concerns by requiring cities and counties to implement instant online permitting platforms, asynchronous inspections, electronic submissions and signatures, expanded public posting requirements, and self-certification to the California Energy Commission. These mandates impose significant costs related to software acquisition, cybersecurity safeguards, system integration, and staff training.

Asynchronous inspections fundamentally alter established inspection practices, increasing liability exposure while reducing accountability. In-person inspections—where inspectors and contractors are present together—allow for immediate clarification, correction, and verification of compliance with approved plans and building codes. This

process improves safety, prevents misunderstandings, and reduces delays and disputes. SB 222 further restricts when site plans may be required and limits local setback and noise standards, undermining the ability of local jurisdictions to address site-specific risks. These limitations are particularly concerning for communities facing wildfire hazards, hillside development, aging multifamily housing, seismic vulnerability, or constrained electrical infrastructure. Reducing local oversight while maintaining local liability increases the likelihood of unsafe installations without providing corresponding authority or resources.

SB 222 also imposes arbitrary permit fee caps of $150 for heat pump water heaters and $200 for HVAC systems, regardless of the actual costs incurred by local agencies. In many jurisdictions, these caps will not cover the cost of plan review, inspections, compliance verification, and enforcement. To recover costs above these limits, local governments must adopt formal findings, a process that requires additional staff time, data collection, and legal review, further increasing administrative burdens and costs. As a result, the bill shifts financial responsibility to local governments while restricting their ability to administer permitting programs responsibly.

Lastly, SB 222 fails to provide appropriate immunity for local agencies issuing permits or conducting inspections pursuant to this bill. Liability for licensing and inspection activities has been included in other recent legislation to guard public entities from the risk of litigation and possible bankruptcy from virtually unlimited claims against the local government failing to prevent injury.

For these reasons we oppose Senate Bill 222, and respectfully ask for a “no” vote when this measure is heard before your committee. Please do not hesitate to contact us if you have any questions.

Sincerely,

Tracy Rhine
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MARK NEUBURGER
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cc: The Honorable Scott Wiener, Member of the California State Senate
Members of the Senate Local Government Committee
Anton Favorini-Csorba, Chief Consultant, Senate Local Government Committee
Ryan Eisberg, Consultant, Senate Republican Caucus

Anne Cottrell
Napa County Supervisor
District 3

Liz Alessio
Napa County Supervisor
District 2

January 7, 2026

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

RE: Senate Bill 299 (Cabaldon) - SUPPORT
As Amended January 5, 2026

Dear Chair Arreguín:

On behalf of the Rural County Representatives of California, Le Petit Elephant, the California State Association of Counties, Build Up California, Napa County Supervisor Anne Cottrell, Napa County Supervisor Liz Alessio, American Planning Association (California Chapter), League of California Cities, Low Income Investment Fund, Community Resources for Children, and the Urban Counties of California, we are pleased to support Senate Bill 299 (Cabaldon), which seeks to protect daycares from California Environmental Quality Act (CEQA) misuse.

Senate Bill 299 expands a recently-enacted CEQA exemption for day care centers to projects located in residential areas.

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 in an attempt to 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*.

Senate Bill 131 (Budget, Chapter 24, Statutes of 2025) sought to exempt day care centers from CEQA and thereby insulate much-needed projects from the real possibility of expensive and protracted CEQA compliance and litigation. While we sincerely appreciate the Legislature's attempt to exempt daycares from CEQA, SB 131's exemption does not apply to daycares located in "a residential area", which is 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. SB 299 builds upon that new exemption by expanding it to day care centers in residential areas, provided the parcel on which the project is located is not zoned exclusively for residential use.

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. SB 299 helps providers and communities expand daycare opportunities.

For these reasons, and given the demonstrated need to prevent future CEQA abuse, we are pleased to support Senate Bill 299. Please do not hesitate to contact us if you have any questions.

Sincerely,

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Senior Policy Advocate
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cc: The Honorable Christopher Cabaldon, California State Senate
The Honorable Sasha Renée Pérez, California State Senate
Diana Dominguez, Consultant, Senate Human Services Committee
Scott Seekatz, Consultant, Senate Republican Caucus

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January 5, 2026

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

Re: SB 677 (Wiener) – Housing development: streamlined approvals.
As Amended on January 5, 2026– Oppose unless Amended

The California State Association of Counties writes to express our concerns and opposition to the current version of SB 677, which is intended to update several provisions of SB 79 (2025).

In January 2026, Senator Wiener amended SB 677 to, amongst a variety of provisions, expand SB 79's provisions to areas that have ferry service terminals. The amendments also attempt to clarify the unresolved issue of which counties have transit areas that are eligible to be included in the provisions of SB 79.

We appreciate the author's ongoing efforts to address the statewide housing crisis and to clarify county eligibility. The below letter explains our concerns in greater detail, why CSAC holds that only four counties are currently impacted by the provisions of SB 79, and proposed amendments to SB 677, without subsequent amendments that create additional ambiguity, would remove CSAC's opposition.

SB 79's applicability to specific counties is unclear

When SB 79 passed the Legislature and was signed into law on October 2025, the author indicated that it was his intention that up to eight counties would be covered by the bill's provisions (Alameda, Los Angeles, Orange, Sacramento, San Diego, San Francisco, San Mateo and Santa Clara)[1]. However, CSAC and other stakeholders interpret

[1] See SB 79 Co-Sponsors: SB 79: Myths & Facts website at: https://cayimby.org/sb-79-explained-more-homes-near-transit

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the new law's current provisions to apply to a maximum of four counties (Alameda, Los Angeles, San Mateo and Santa Clara).

The applicability of SB 79's statutes to counties is unclear, which could increase the likelihood for counties to be brought into litigation related to housing projects proposed pursuant to SB 79's provisions. Unfortunately, the current language of SB 677 neither lists the counties to which SB 79 applies, nor does the bill add definitions to terms used in SB 79 that could clarify county applicability. CSAC urges the author to amend SB 677 to define several ambiguous terms and list which counties to which the bill's provisions apply. We urge the author to consider and adopt the following amendments:

Interrelated and ambiguous definitions of "urban transit county" and "heavy rail transit":

Many counties are struggling to determine how and whether the "urban transit county" definition created by the bill applies to them. Under the definition created by SB 79, an urban transit county is a county "with more than 15 passenger rail stations." However, SB 79 did not define "passenger rail stations" or what services constitute "passenger rail service".

SB 677's recharacterization of "passenger rail stations" as rail transit stations" does not clarify this ambiguity. As a result, counties that might be impacted by SB 79 are using existing state and federal statutory definitions to determine if and how the provisions of SB 79 could impact them. SB 79 directs to Public Utilities Code (PUC) Section 99602 for clarity of one of its definitions. PUC 99602, created by a 1990 passenger rail bond act that was approved by voters, provides the following terms which are relevant to SB 79 and defined as follows:

- "Commuter rail service" and its derivative terms have the same meaning as the term "commuter service" and its derivative terms, as defined in paragraph (9) of subsection (a) of Section 502 of Title 45 of the United States Code. (*Section 502 was repealed in 1994 and was moved to Section 24102 of Title 49 of the United States Code*)

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  - USC Section 24102: "Commuter rail passenger transportation" means short-haul rail passenger transportation in metropolitan and suburban areas usually having reduced fare, multiple-ride, and commuter tickets and morning and evening peak period operations.
- "Intercity rail" and its derivative terms means passenger rail service between urban areas of the state.
  - USC Section 24102"intercity rail passenger transportation" means rail passenger transportation, except commuter rail passenger transportation.
- "CalTrain" means the commuter rail service operated along the San Francisco Peninsula commute corridor.

In state and federal statutes, the term "passenger rail" and any "passenger rail stations" refer to the 3 intercity passenger rail services operated by the state and the 4 commuter rail services that operate wholly or partially in rail corridors owned by the federal class I freight railroads Union Pacific and BNSF. The three intercity passenger rail services operated by the state and four commuter rail services are:

- Capitol Corridor (State)
- Gold Runner (formerly the San Joaquins, State)
- Pacific Surfliner (State)
- Altamont Corridor Express (Commuter)
- CalTrain (Commuter)
- Metrolink (Commuter)
- Coaster (Commuter)

CSAC did not include the SPRINTER system in San Diego County, the ARROW service in San Bernardino County, or the SMART system in Sonoma and Marin Counties in this count as these services operate less than 48 trains per day and are excluded by SB 677's definition of "high-frequency commuter rail."

A key feature of these seven intercity and commuter rail passenger services is that they operate on dedicated rail right of way (*i.e. vehicle and foot traffic are prohibited from accessing the track*), and these stations have high platforms to facilitate passenger loading and

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unloading. These features contrast with light rail, streetcar, and trolley operations, which universally have some portion of their systems share right of way with vehicle and pedestrian traffic (*i.e. allow vehicles to share lanes with trains, have uncontrolled vehicle & pedestrian grade crossings, etc*.) and have stations with street level platforms.

SB 79 created the 'heavy rail transit' definition to apply its provisions to the Bay Area Rapid Transit (BART) system due to the unique features the rail system has, such as its unique rail gauge, transit-like operating headways and completely dedicated right of way that can't be used by other freight or passenger rail providers. Despite the unique definition created by SB 79 for BART, BART's system and stations are designed such that they are functionally similar to the state's four commuter rail services. However, SB 79's 'heavy rail transit' definition excludes the three stations in Contra Costa County that BART serves with diesel (*i.e. not electric*) trains, thus excluding those stations from applying to Contra Costa County's station count. This is just one example of how these ambiguous terms and/or undefined terms are creating confusion for counties.

Using the above definitions provided through existing state and federal statutes the number of passenger rail stations served by the state's 8 intercity passenger, commuter and heavy rail services, is as follows:

- Alameda County: 30 stations
  - (*22 Stations served by BART, 8 stations served by the Capitol Corridor, Gold Runner and Altamont Corridor Express*)
- Los Angeles County: 28 stations
  - (*28 stations served Metrolink, 5 of the 28 stations served by the Pacific Surfliner*)
- San Mateo County: 18 stations
  - (*12 weekday stations served by Caltrain, 6 stations served by BART*)
- Santa Clara County: 17 stations
  - (*15 weekday stations served by Caltrain, 4 of the 15 stations are served by the Capitol Corridor, Gold Runner and Altamont Corridor Express, 2 stations served by BART*)

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CSAC holds that SB 79 as signed into law, as well as the changes currently proposed by SB 677, applies to just these 4 counties based on the above definitions. We provide a count of the 4 other counties the author appears to intend the provisions of SB 79 to apply to. Further, the changes proposed by SB 677 don't address these fundamental definitional issues.

CSAC requests that the author amend SB 677 to list the counties to which the provisions of SB 79 apply. Further, CSAC requests that SB 677 clarify the definition of 'urban transit county' to specify in statute the counties to which it applies.

Concerns about "High frequency ferry service" definition

SB 677 appears to create issues with its current definition of "high-frequency ferry service" to apply SB 79's provisions to land adjacent to ferry services that operate in San Francsico Bay. The definition as drafted in SB 677 appears to apply the provisions of SB 79 to ferry services outside of San Francisco Bay, including the Catalina Express, Balboa Island, and Coronado Ferry services in Southern California, as well as the proposed Lake Tahoe cross-lake passenger ferry service.

CSAC requests that SB 677 be amended to include a list of the counties to which the definition of "high frequency ferry service" is intended to apply. For the reasons outlined above, we respectfully request the author to amend SB 677 to make SB 79's applicability clearer. Further, we are requesting the author to amend SB 677 to clarify the specific counties they believe SB 79's provisions should apply to. These amendments, along with discussions regarding clarification of several defined and undefined terms in SB 79, would allow us to remove our opposition to the current version of SB 677. If you have any questions, please do not hesitate to contact me to discuss this in greater detail at (916) 591-2764.

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Sincerely,

Mark Neuburger
Legislative Advocate
CSAC

Cc: The Honorable Scott Wiener, Member of the California State Senate
Members and staff, Senate Local Government Committee
Jonathan Peterson, Principal Consultant, Assembly Local Government Committee

Station Count of the 4 counties the Author indicated SB 79 is intended to apply (*CSAC maintains the current language does not apply to these counties*):

- Orange County: 12 stations
  - *11 weekday stations served by Metrolink, 5 of the 11 stations served by the Pacific Surfliner, 1 station served for weekday commutes by the Pacific Surfliner*
- San Francisco County: 10 stations
  - *8 stations served by BART, 2 stations served by CalTrain*.
- San Diego County: 8 stations
  - *8 stations served by Coaster, 3 of the 8 stations served by the Pacific Surfliner.*
- Sacramento County: 1 station
  - *1 station served by the Capitol Corridor*.

January 7, 2026

The Honorable Christopher Cabaldon
California State Senate
1021 O Street, Suite 7320
Sacramento, CA 95814

Re: **SB 430 (Cabaldon): Local agencies: automated decision systems**
As amended 1/05/26 – CONCERNS
Set for hearing 1/13/26 and 1/14/26 – Senate Judiciary Committee and Senate Local Government Committee

Dear Senator Cabaldon:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the California State Association of Counties (CSAC), the League of California Cities (CalCities), the County Welfare Directors Association (CWDA), the County Behavioral Health Directors Association (CBHDA), and the California Special Districts Association (CSDA), we write to share concerns with recent amendments to your Senate Bill 430. We understand that the intent of this measure is to incentivize the use of automated decision systems (ADS) by setting parameters by which local agencies can utilize these systems to help facilitate services to residents. While we appreciate your ongoing interest in innovation by local agencies and agree that providing services to our communities should be efficient, effective, and timely, we have concerns about the approach outlined in the amendments, as discussed below.

Local agencies are implementing ADS systems successfully. As we have shared with the Legislature previously regarding measures that were proposed to limit local agencies' use of ADS, automated decision systems are already in use at the local level. Specifically, local agencies utilize such systems in health care provision (scheduling, billing, clinical recommendations, tracking prescriptions, monitoring for drug theft, and workplace safety) and human resources (employee scheduling and training and development), as examples. As technologies geared to government use become more available and more affordable, it is likely that more local agencies will find utility in adopting such technologies; however,

adoption will largely depend upon local needs, fiscal resources, and human capacity to implement.

Proposed language appears to apply broadly. Like other measures, the definitions included in the proposed amendments to the bill appear to apply to a wide range of technologies and a broad array of services that may not be suited to the limitations outlined therein. In certain instances, the burdens required to comply with the provisions of the measure may actually disincentivize use of such tools.

The Governmental Operations Agency seems ill-equipped to provide guidance on the appropriate tools to implement local services. Local agencies do not typically work with Gov Ops on implementation of local programs or services, so we anticipate that providing guidance on ADS tools would require a significant investment of resources to build that capacity within the Agency. Further, we argue that local agencies remain best-suited to evaluate the utility and capacity for implementing such systems.

Social services eligibility is guided by federal and state law, not locals. We have strong concerns about the inclusion of guidelines about ADS technology in evaluating eligibility for CalFresh and Medi-Cal. While counties administer eligibility for these programs on the state's behalf, they are highly regulated by the federal government. Each of California's 58 counties is obligated to utilize statewide systems that are designed to comply with federal law and regulation; there are few, if any, opportunities to modify these activities at the local level. Further, opt-out language associated with supportive services is unnecessary, as each application for these services is reviewed by a human under current regulatory requirements. Finally, these are programs that will be dramatically impacted by the implementation of HR 1; county efforts in 2026 and beyond will be working to maximize enrollment and retention to the greatest extent possible and believe that state resources to assist counties in doing so should be a priority.

To be clear, we are committed to engaging with you and your staff to discuss helpful ways to encourage adoption of technologies that have the potential to enhance the quality of life for those we serve. At this time, however, we appreciate the opportunity to share our concerns with you regarding the recent amendments to SB 430.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Sarah Dukett
Senior Policy Advocate
Rural County Representatives of California

Emma Jungwirth
Senior Legislative Representative
California State Association of Counties

Marcus Detwiler
Legislative Representative
California Special Districts Association

Amanda Kirchner
Director of Legislative Advocacy
California Welfare Directors Association

Amer W. Rashid
Director of Legislative Affairs
CBHDA

Johnnie Pina
Legislative Representative
League of California Cities

cc: Honorable Members, Senate Judiciary Committee
Honorable Members, Senate Local Government Committee
Christian Kurpiewski, Deputy Chief Counsel, Senate Judiciary Committee
Anton Favorini-Csorba, Chief Consultant, Senate Local Government Committee

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California State Association of Counties®
LEGISLATIVE ALERT

December 30, 2025

ASSEMBLY FLOOR ALERT

Assembly Bill 568 (Macedo) – Tule East Groundwater Sustainability Agency Act.

As Amended July 18, 2025 – **SUPPORT**

Assembly Concurrence in Senate Amendments

Dear Honorable Members of the California State Assembly,

The California State Association of Counties (CSAC), representing California's 58 counties, writes in support of AB 568 (Macedo). This bill would establish the Tule East Groundwater Sustainability Agency (GSA), tasked with groundwater management in portions of the Tule Subbasin and the implementation of the Sustainable Groundwater Management Act (SGMA). This bill gives GSA representation back to areas of eastern Tulare County formerly covered by the now-defunct Eastern Tule GSA, and, importantly, establishes a new board of directors that includes an elected supervisor from the County.

Counties have a vital role to play in the successful implementation of SGMA. They are frequent participants in GSAs across the state, and particularly the Central Valley. County supervisors and staff have responsibilities and expertise in land use, drinking water, irrigation, wells, agricultural practices, and almost every other aspect of groundwater management. In many subbasins, counties have been key architects of groundwater sustainability plans alongside their SGMA partners, and have shouldered the responsibility of administering many of the reporting, data management, allocation, and oversight duties that GSAs carry out. It is at the local level, through partnerships between local governments and communities, farmers, conservationists, and all other stakeholders, where sustainability will be achieved.

The situation in eastern Tulare is emblematic of the need for counties to have representation at the GSA level, as much as possible. Counties are very often the final backstop for areas that do not have pre-existing regional representation through entities such as cities, irrigation districts, utilities districts, and others. The dissolution of the Eastern Tule GSA left certain

communities behind, without any immediate means to do their part to help lift the Tule subbasin out of probationary status under SGMA. The County of Tulare is taking the necessary actions to step up and assist.

CSAC supports efforts such as AB 568 that provide counties with the necessary tools to fulfill state-mandated activities under SGMA and ensure a sustainable future for communities, industry, and the environment. We respectfully urge you to vote in favor of concurring in Senate amendments and moving this important bill to the Governor's desk.

If you have any questions about our position, please do not hesitate to reach out to Charles Delgado, Legislative Advocate, at cdelgado@counties.org.

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December 31, 2025

The Honorable Jesse Arreguín
Chair, California State Senate Housing Committee
1021 O Street, Suite 3330
Sacramento, CA 95814

Re: SB 677 (Wiener) – Housing development: transit-oriented development. As Amended on January 5, 2026– Oppose unless Amended

The California State Association of Counties writes to express our concerns and opposition to the current version of SB 677, which is intended to update several provisions of SB 79 (2025).

In January 2026, Senator Wiener amended SB 677 to, amongst a variety of provisions, expand SB 79's provisions to areas that have ferry service terminals. The amendments also attempt to clarify the unresolved issue of which counties have transit areas that are eligible to be included in the provisions of SB 79.

We appreciate the author's ongoing efforts to address the statewide housing crisis and to clarify county eligibility. The below letter explains our concerns in greater detail, why CSAC holds that only four counties are currently impacted by the provisions of SB 79, and proposed amendments to SB 677, without subsequent amendments that create additional ambiguity, would remove CSAC's opposition.

SB 79's applicability to specific counties is unclear

When SB 79 passed the Legislature and was signed into law on October 2025, the author indicated that it was his intention that up to eight counties would be covered by the bill's provisions (Alameda, Los Angeles, Orange, Sacramento, San Diego, San Francisco, San Mateo and Santa Clara)[1]. However, CSAC and other stakeholders interpret the new law's current provisions to apply to a maximum of four counties (Alameda, Los Angeles, San Mateo and Santa Clara).

[1] See SB 79 Co-Sponsors: SB 79: Myths & Facts website at: https://cayimby.org/sb-79-explained-more-homes-near-transit

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The applicability of SB 79's statutes to counties is unclear, which could increase the likelihood for counties to be brought into litigation related to housing projects proposed pursuant to SB 79's provisions. Unfortunately, the current language of SB 677 neither lists the counties to which SB 79 applies, nor does the bill add definitions to terms used in SB 79 that could clarify county applicability. CSAC urges the author to amend SB 677 to define several ambiguous terms and list which counties to which the bill's provisions apply. We urge the author to consider and adopt the following amendments:

Interrelated and ambiguous definitions of "urban transit county" and "heavy rail transit":

Many counties are struggling to determine how and whether the "urban transit county" definition created by the bill applies to them. Under the definition created by SB 79, an urban transit county is a county "with more than 15 passenger rail stations." However, SB 79 did not define "passenger rail stations" or what services constitute "passenger rail service".

SB 677's recharacterization of "passenger rail stations" as rail transit stations" does not clarify this ambiguity. As a result, counties that might be impacted by SB 79 are using existing state and federal statutory definitions to determine if and how the provisions of SB 79 could impact them. SB 79 directs to Public Utilities Code (PUC) Section 99602 for clarity of one of its definitions. PUC 99602, created by a 1990 passenger rail bond act that was approved by voters, provides the following terms which are relevant to SB 79 and defined as follows:

- "Commuter rail service" and its derivative terms have the same meaning as the term "commuter service" and its derivative terms, as defined in paragraph (9) of subsection (a) of Section 502 of Title 45 of the United States Code. (*Section 502 was repealed in 1994 and was moved to Section 24102 of Title 49 of the United States Code*)
  - USC Section 24102: "Commuter rail passenger transportation" means short-haul rail passenger transportation in metropolitan and suburban areas usually having reduced fare, multiple-ride, and commuter tickets and morning and evening peak period operations.
- "Intercity rail" and its derivative terms means passenger rail service between urban areas of the state.
  - USC Section 24102"intercity rail passenger transportation" means rail passenger transportation, except commuter rail passenger transportation.

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- "CalTrain" means the commuter rail service operated along the San Francisco Peninsula commute corridor.

In state and federal statutes, the term "passenger rail" and any "passenger rail stations" refer to the 3 intercity passenger rail services operated by the state and the 4 commuter rail services that operate wholly or partially in rail corridors owned by the federal class I freight railroads Union Pacific and BNSF. The three intercity passenger rail services operated by the state and four commuter rail services are:

- Capitol Corridor (State)
- Gold Runner (formerly the San Joaquins, State)
- Pacific Surfliner (State)
- Altamont Corridor Express (Commuter)
- CalTrain (Commuter)
- Metrolink (Commuter)
- Coaster (Commuter)

CSAC did not include the SPRINTER system in San Diego County, the ARROW service in San Bernardino County, or the SMART system in Sonoma and Marin Counties in this count as these services operate less than 48 trains per day and are excluded by SB 677's definition of "high-frequency commuter rail."

A key feature of these seven intercity and commuter rail passenger services is that they operate on dedicated rail right of way (*i.e. vehicle and foot traffic are prohibited from accessing the track*), and these stations have high platforms to facilitate passenger loading and unloading. These features contrast with light rail, streetcar, and trolley operations, which universally have some portion of their systems share right of way with vehicle and pedestrian traffic (*i.e. allow vehicles to share lanes with trains, have uncontrolled vehicle & pedestrian grade crossings, etc*.) and have stations with street level platforms.

SB 79 created the 'heavy rail transit' definition to apply its provisions to the Bay Area Rapid Transit (BART) system due to the unique features the rail system has, such as its unique rail gauge, transit-like operating headways and completely dedicated right of way that can't be used by other freight or passenger rail providers. Despite the unique definition created by SB 79 for BART, BART's system and stations are designed such that they are functionally similar to the state's four commuter rail services. However, SB 79's 'heavy rail transit' definition excludes the three stations in Contra Costa County that BART serves with diesel

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(*i.e. not electric*) trains, thus excluding those stations from applying to Contra Costa County's station count. This is just one example of how these ambiguous terms and/or undefined terms are creating confusion for counties.

Using the above definitions provided through existing state and federal statutes the number of passenger rail stations served by the state's 8 intercity passenger, commuter and heavy rail services, is as follows:

- Alameda County: 30 stations
  - (*22 Stations served by BART, 8 stations served by the Capitol Corridor, Gold Runner and Altamont Corridor Express*)
- Los Angeles County: 28 stations
  - (*28 stations served Metrolink, 5 of the 28 stations served by the Pacific Surfliner*)
- San Mateo County: 18 stations
  - (*12 weekday stations served by Caltrain, 6 stations served by BART*)
- Santa Clara County: 17 stations
  - (*15 weekday stations served by Caltrain, 4 of the 15 stations are served by the Capitol Corridor, Gold Runner and Altamont Corridor Express, 2 stations served by BART*)

CSAC holds that SB 79 as signed into law, as well as the changes currently proposed by SB 677, applies to just these 4 counties based on the above definitions. We provide a count of the 4 other counties the author appears to intend the provisions of SB 79 to apply to. Further, the changes proposed by SB 677 don't address these fundamental definitional issues.

CSAC requests that the author amend SB 677 to list the counties to which the provisions of SB 79 apply. Further, CSAC requests that SB 677 clarify the definition of 'urban transit county' to specify in statute the counties to which it applies.

Concerns about "High frequency ferry service" definition

SB 677 appears to create issues with its current definition of "high-frequency ferry service" to apply SB 79's provisions to land adjacent to ferry services that operate in San Francsico Bay. The definition as drafted in SB 677 appears to apply the provisions of SB 79 to ferry services outside of San Francisco Bay, including the Catalina Express, Balboa Island, and Coronado Ferry services in Southern California, as well as the proposed Lake Tahoe cross-lake passenger ferry service.

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CSAC requests that SB 677 be amended to include a list of the counties to which the definition of "high frequency ferry service" is intended to apply.

For the reasons outlined above, we respectfully request the author to amend SB 677 to make SB 79's applicability clearer. Further, we are requesting the author to amend SB 677 to clarify the specific counties they believe SB 79's provisions should apply to. These amendments, along with discussions regarding clarification of several defined and undefined terms in SB 79, would allow us to remove our opposition to the current version of SB 677. If you have any questions, please do not hesitate to contact me to discuss this in greater detail at (916) 591-2764.

Sincerely,

Mark Neuburger
Legislative Advocate
CSAC

Cc: The Honorable Scott Wiener, Member of the California State Senate
Members and staff, Senate Housing Committee
Alison Hughes, Chief Consultant, Assembly Appropriations Committee
Kerry Yoshida, Consultant, Assembly Republican Caucus

Station Count of the 4 counties the Author indicated SB 79 is intended to apply (*CSAC maintains the current language does not apply to these counties*):

- Orange County: 12 stations
  - *11 weekday stations served by Metrolink, 5 of the 11 stations served by the Pacific Surfliner, 1 station served for weekday commutes by the Pacific Surfliner*
- San Francisco County: 10 stations
  - *8 stations served by BART, 2 stations served by CalTrain*.
- San Diego County: 8 stations
  - *8 stations served by Coaster, 3 of the 8 stations served by the Pacific Surfliner.*
- Sacramento County: 1 station
  - *1 station served by the Capitol Corridor*.

January 6, 2026

Assemblymember Isaac Bryan
Chair, Assembly Natural Resources Committee
1020 N Street, Suite 164
Sacramento, CA 95814

RE: SUPPORT – AB 35 (Alvarez): Proposition 4 Administrative Procedure Act (APA) Exemption
SET FOR JANUARY 12, 2026

Dear Chair Bryan,

On behalf of the undersigned organizations, we write in strong support of AB 35 (Alvarez), which would exempt Proposition 4 spending from the Administrative Procedure Act (APA). The signatures below represent a broad community of stakeholders, including many environmentally focused organizations that played a critical role in advocating for Proposition 4's passage on the November 2024 ballot.

Exempting Proposition 4 funding from the APA is consistent with long standing precedent for natural resource bonds, including Proposition 84 and Proposition 68. A full exemption would enable funds to be deployed more quickly and efficiently, ensuring that protracted administrative processes do not hold up vital community projects. Agencies such as the State Water Resources Control Board (SWRCB), the Department of Water Resources and the Department of Food and Agriculture have noted that a standard process, complete with review by the Office of Administrative Law (OAL), could result in delays of 12 to 18 months before communities receive awards. These delays run counter to overwhelming support of the voters for Proposition 4 and their desire to see needed projects start in a timely manner. In fact, there are pressing issues such as border rivers, groundwater recharge, water recycling, and wildfire prevention that require immediate funding. Existing programs were created using the processes dictated by prior bonds. Hence, the programs most able to spend funds quickly will be forced to needlessly restructure them to meet the regulatory requirement established by the September Appropriations bill. For example, the SWRCB's drinking water funding program will be adversely impacted since under the current rules, all funding sources within the program are covered under the SWRCB's Intended Use Plan (IUP), which allows flexibility in which sources of funding are used for different projects, and the IUP includes Proposition 4 funds. Without the exemption from the APA process, the Prop 4 funding would have to be backed out of the IUP and limit the ability to use a broad mix of funding to achieve the State's goals of providing a safe and reliable drinking water supply.

Importantly, an exemption from the APA does not eliminate transparency, consultation, or public engagement. Agencies will continue to follow robust fiscal, reporting, and oversight requirements. Many agencies have already gone through extensive public processes for these existing programs. Instead, the exemption will streamline implementation, maintain consistency across programs, and avoid creating barriers to delivering critical funding where it is most needed.

Without an APA exemption, the delays already emerging threaten the success of essential projects across the state, including many that are shovel ready. Providing this exemption will accelerate timelines, reduce administrative burdens, and honor the commitment voters made to California's communities.

For these reasons, we strongly support a full exemption from the APA for all Proposition 4 funding.

Sincerely,

Agricultural Institute of Marin
Association of California Water Agencies (ACWA)
Bay Area Council

Bay Area Ridge Trail Council
Bay Planning Coalition

Big Sur Land Trust
Bolsa Chica Land Trust
CA Local Conservation Corps Foundation
CalDesal
California Association of Local Conservation Corps
California Association of Resource Conservation Districts
California Association of Sanitation Agencies (CASA)
California Climate and Agriculture Network
California Council of Land Trusts
California Fire Chiefs Association

California Habitat Conservation Planning Coalition
California Invasive Plant Council
California Municipal Utilities Association
California State Association of Counties (CSAC)
California State Parks Foundation
California Stormwater Quality Association (CASQA)
Calleguas Municipal Water District
Carbon Cycle Institute
Central California Environmental Justice Network
Cesar Chavez Environmental Corp (CCEC)
City of Sacramento
Civicorps
Clean Water Action

Climate Resolve
Coastal Corridor Alliance
Collaborate Action Program
Community Water Center

East Bay Regional Park District
East Contra Costa County Habitat Conservancy
Eastern Municipal Water District
El Dorado Water Agency
Endangered Habitats League
FHBP, Friends of Harbors Beaches and Parks
Fire District Association of California
Fresno EOC Local Conservation Corps
Greater Valley Conservation Corps
Hi-Desert Water District
Irvine Ranch Water District
Land Trust of Santa Cruz County

League of California Cities

Los Angeles Conservation Corps

Los Angeles Neighborhood Land Trust
Midpeninsula Regional Open Space District
Mission Spring Water District

Monterey One Water
Napa County Regional Park and Open Space District
Orange County Conservation Corps

Outward Bound Adventures (OBA)
Peninsula Open Space Trust

Placer County Water Agency
Rails to Trails Conservancy
RCD of Greater San Diego County

Rural County Representatives of California (RCRC)

Sacramento Area Sewer District
Sacramento Regional Conservation Corps
San Diego County Water Authority
San Diego Zoo Wildlife Alliance
San Gorgonio Pass Water Agency
San Joaquin Valley Water Collaborative Action Program

Conservation Corps North Bay
Conservation Corps of Long Beach
County of San Diego
San Jose Conservation Corps
Santa Margarita Water District
Save Mount Diablo
Sweetwater Authority
San Luis & Delta Mendota Water Authority
Santa Clara Valley Open Space Authority
Save the Redwoods League
Sempervirens Fund
Sequoia Community Corps
Sloughhouse Resource Conservation District
Sonoma County Ag + Open Space
Sonoma Land Trust
Sonoma Water
Southern California Mountains Foundation
Southern California Water Coalition
TEAMRCD
The Conservation Fund
The Freshwater Trust
The Nature Conservancy
The San Diego Natural History Museum
The Wilderness Society
The Wildlands Conservancy
Upper San Luis Rey Resource Conservation District
Urban Corps of San Diego County
Valley Water
Water Blueprint for the San Joaquin Valley Advocacy Fund
WaterReuse California

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February 19, 2026

The Honorable Dr. Corey Jackson, Chair
Assembly Budget Subcommittee No. 2
1021 O Street, Suite 6120
Sacramento, CA 95814

RE: In-Home Supportive Services Assessed Hours Trailer Bill Language – Oppose

Dear Chair Jackson:

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I am writing to share our strong opposition to the Governor's In-Home Supportive Services (IHSS) assessed hours budget proposal. This proposal would essentially shift an estimated $233.6 million in IHSS costs from the state to counties, which would negatively impact the IHSS program and the broad health and human services programs that counties administer on behalf of the state.

The IHSS assessed hours proposal would back out the state's share of costs in IHSS hours growth and instead require counties to pay for these costs. This would be enacted through the proposed trailer bill language that would establish a baseline statewide average for IHSS hours per case. Counties with an average authorized IHSS hours per case above that statewide average would be responsible for 100 percent of the nonfederal share of the county's increased IHSS hours exceeding that baseline. CSAC is strongly opposed to this proposal that would undermine the existing IHSS fiscal structure, exacerbate the safety net impacts of H.R. 1, misdiagnose the cause of hours growth, and negatively impact IHSS recipients and providers.

Proposal undermines fiscal structure and creates additional cost pressures on counties

The existing IHSS fiscal structure was established in 2019 (Chapter 27, Statutes of 2019) through the creation of a new county IHSS maintenance of effort (MOE). The 2019 MOE was enacted consistent with recommendations from the Department of Finance in the Senate Bill 90: 1991 Realignment Report. As outlined by the Department of Finance, the primary purpose of this MOE is to ensure that county IHSS costs fit within available social services Realignment revenues so that counties do not have to continue to take funding away from

health and mental health programs to cover IHSS costs as occurred under the 2017 MOE. The report acknowledges that changes to the IHSS program enacted by the state and federal government, including collective bargaining, minimum wage increases, and overtime rules, caused IHSS program costs to grow beyond what counties could cover within the available social services Realignment funding.

The IHSS assessed hours proposal directly undermines the 2019 MOE structure, which has been essential to sustaining county health and human services programs within Realignment. Under the MOE, county IHSS costs can only increase in two ways – (1) annual four percent MOE inflation factor (intended to match historical Realignment growth) and (2) county share of costs for locally negotiated increases to IHSS provider wages and benefits. This proposal would significantly increase county IHSS costs outside of those two allowable methods and above the MOE requirement. It would cause counties to have to redirect funding from other critical health and mental health programs, running contrary to the purpose of the MOE.

Counties are already facing their own fiscal pressures from IHSS costs. The UC Berkeley Labor Center released a study in 2024 that was commissioned by the California Department of Social Services as part of the statewide collective bargaining workgroup effort. According to the study, county IHSS costs are growing at a faster rate than Realignment revenues (6.5 percent vs. 4.6 percent between FY 2017-18 and FY 2024-25). The study also noted that this growth disparity is likely to continue and that counties will have less revenues available for other realigned programs. In addition, for the past two years, the 1991 Realignment sales tax revenues have failed to reach base. The consequence of this base shortfall is that there has been no sales tax growth revenues available to be utilized for these increased IHSS costs. There is currently $230 million in unpaid caseload growth resulting primarily from the IHSS inflation factor and county adopted wage and health benefit increases for IHSS providers.

Finally, counties also face cost pressures from being underfunded for the critical work that IHSS social workers do to verify eligibility and perform timely reassessments. Last year, the Administration reassessed the IHSS administrative funding methodology and found that counties are underfunded by approximately $125 million General Fund. This situation continues and was aggravated by the cost shift for counties to cover Community First Choice Option penalties, which are directly related to the inadequate administrative funding.

IHSS cost shift would exacerbate H.R. 1 impacts on the safety net

Counties are facing massive cost increases as a result of the implementation of federal H.R. 1. These include increased demand for indigent medical care, increased eligibility workforce needs, and direct cost shifts. CSAC recently released an analysis showing that counties are facing between $6 billion and $9.5 billion in anticipated annual costs as a result of H.R. 1.

Unfortunately, the Governor's Budget does not include any funding for counties to address these significant cost increases. In addition, with this IHSS proposal, it actually compounds the county fiscal pressures by shifting additional safety net costs. This proposal further jeopardizes the safety net, as counties cannot backfill federal funding from H.R. 1 implementation, especially if additional state cuts are layered on top of those impacts. Counties are the safety net providers in California performing the on-the-ground work to enroll and serve vulnerable families, children, and older adults and need a partnership with the state to address H.R. 1 costs and not create additional safety net concerns.

Demographic changes are causing hours growth

There are two state-mandated and validated tools, the Functional Index Rankings and Hourly Task Guidelines, that county social workers use to determine the number of IHSS hours to authorize for a recipient. The guidelines have time ranges that provide for allowable and appropriate variation in hours for the same functional index score. The use of these tools is overseen by the California Department of Social Services (CDSS) and counties use them in accordance with CDSS guidance and a rigorous quality assurance process. The increase in hours per case is not caused by counties inappropriately using these tools, but rather the result of a number of factors outside of the control of counties.

According to an analysis from the County Welfare Directors Association (CWDA), IHSS hours per case are growing because of changing demographics and program participation, primarily three changes:

1. There are more older adults in the IHSS program and they are living for longer. As older adults continue to age, their assistance needs grow, but not always significantly enough to change their functional index score. It is appropriate for increased hours to be authorized to meet their increased needs even if their functional index score remains the same.
2. There has also been a significant increase in the number of minors who receive IHSS services. For minors, hours are not authorized for certain tasks that are expected for

their developmental stage, but as they grow and require help for those tasks, those hours can then be authorized even if their functional index score remains the same.
3. There continues to be an increase in protective supervision cases, which receive the maximum number of authorized hours.

The hours growth that is occurring is consistent with these demographic changes and was occurring prior to the establishment of the 2019 MOE. In fact, in the SB 90: 1991 Realignment Report that recommended the current MOE structure, the Department of Finance acknowledges that there is growth in hours per case and that the primary cause of this growth is the increasing disabled and protective supervision caseload.

<u>IHSS proposal would negatively impact recipients and providers</u>
CSAC has significant concerns that this IHSS assessed hours proposal would result in negative impacts to program participants and IHSS providers given the significant fiscal strain it would put on county safety net services. This proposal would create a situation with a misaligned incentive for counties to reduce or limit service hours that are legitimately needed by recipients to remain safely in their homes. It would also make it difficult to continue the substantial progress by counties to increase wages and benefits for IHSS providers that has occurred under this MOE. In fact, this proposal is likely to create a chilling effect on collective bargaining efforts. Finally, the structure proposed in the trailer bill language is problematic. The concept of a statewide average creates a situation whereby counties, and therefore the recipients and providers in those counties, are punished by their demographics causing their hours growth to be above the statewide average.

For all of these reasons, CSAC urges the Legislature to reject the IHSS assessed hours proposal. Counties are committed to this life-saving program that helps vulnerable individuals remain safely in their homes and seek your partnership in protecting this program from this harmful proposal.

Sincerely,

Justin Garrett
Senior Legislative Advocate

cc: The Honorable Jesse Gabriel, Chair, Assembly Budget Committee
Honorable Members, Assembly Budget Subcommittee No. 2
Nicole Vazquez, Deputy Chief Consultant, Assembly Committee on Budget
Eric Dietz, Principal Consultant, Assembly Republican Fiscal Office
Kelsy Castillo, Policy Consultant, Office of the Speaker
Ginni Bella Navarre, Deputy Legislative Analyst, Legislative Analyst's Office
Claire Ramsey, Chief Deputy Director, California Department of Social Services
Samantha Lui, Deputy Secretary, California Health and Human Services Agency
Kris Cook, Program Budget Manager, Department of Finance
Paula Villescaz, Deputy Legislative Secretary, Office of Governor Newsom

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February 19, 2026

The Honorable Caroline Menjivar, Chair
Senate Budget and Fiscal Review Subcommittee No. 3
1021 O Street, Suite 6630
Sacramento, CA 95814

RE: In-Home Supportive Services Assessed Hours Trailer Bill Language – Oppose

Dear Chair Menjivar:

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I am writing to share our strong opposition to the Governor's In-Home Supportive Services (IHSS) assessed hours budget proposal. This proposal would essentially shift an estimated $233.6 million in IHSS costs from the state to counties, which would negatively impact the IHSS program and the broad health and human services programs that counties administer on behalf of the state.

The IHSS assessed hours proposal would back out the state's share of costs in IHSS hours growth and instead require counties to pay for these costs. This would be enacted through the proposed trailer bill language that would establish a baseline statewide average for IHSS hours per case. Counties with an average authorized IHSS hours per case above that statewide average would be responsible for 100 percent of the nonfederal share of the county's increased IHSS hours exceeding that baseline. CSAC is strongly opposed to this proposal that would undermine the existing IHSS fiscal structure, exacerbate the safety net impacts of H.R. 1, misdiagnose the cause of hours growth, and negatively impact IHSS recipients and providers.

Proposal undermines fiscal structure and creates additional cost pressures on counties

The existing IHSS fiscal structure was established in 2019 (Chapter 27, Statutes of 2019) through the creation of a new county IHSS maintenance of effort (MOE). The 2019 MOE was enacted consistent with recommendations from the Department of Finance in the Senate Bill 90: 1991 Realignment Report. As outlined by the Department of Finance, the primary purpose of this MOE is to ensure that county IHSS costs fit within available social services Realignment revenues so that counties do not have to continue to take funding away from

health and mental health programs to cover IHSS costs as occurred under the 2017 MOE. The report acknowledges that changes to the IHSS program enacted by the state and federal government, including collective bargaining, minimum wage increases, and overtime rules, caused IHSS program costs to grow beyond what counties could cover within the available social services Realignment funding.

The IHSS assessed hours proposal directly undermines the 2019 MOE structure, which has been essential to sustaining county health and human services programs within Realignment. Under the MOE, county IHSS costs can only increase in two ways – (1) annual four percent MOE inflation factor (intended to match historical Realignment growth) and (2) county share of costs for locally negotiated increases to IHSS provider wages and benefits. This proposal would significantly increase county IHSS costs outside of those two allowable methods and above the MOE requirement. It would cause counties to have to redirect funding from other critical health and mental health programs, running contrary to the purpose of the MOE.

Counties are already facing their own fiscal pressures from IHSS costs. The UC Berkeley Labor Center released a study in 2024 that was commissioned by the California Department of Social Services as part of the statewide collective bargaining workgroup effort. According to the study, county IHSS costs are growing at a faster rate than Realignment revenues (6.5 percent vs. 4.6 percent between FY 2017-18 and FY 2024-25). The study also noted that this growth disparity is likely to continue and that counties will have less revenues available for other realigned programs. In addition, for the past two years, the 1991 Realignment sales tax revenues have failed to reach base. The consequence of this base shortfall is that there has been no sales tax growth revenues available to be utilized for these increased IHSS costs. There is currently $230 million in unpaid caseload growth resulting primarily from the IHSS inflation factor and county adopted wage and health benefit increases for IHSS providers.

Finally, counties also face cost pressures from being underfunded for the critical work that IHSS social workers do to verify eligibility and perform timely reassessments. Last year, the Administration reassessed the IHSS administrative funding methodology and found that counties are underfunded by approximately $125 million General Fund. This situation continues and was aggravated by the cost shift for counties to cover Community First Choice Option penalties, which are directly related to the inadequate administrative funding.

IHSS cost shift would exacerbate H.R. 1 impacts on the safety net

Counties are facing massive cost increases as a result of the implementation of federal H.R. 1. These include increased demand for indigent medical care, increased eligibility workforce needs, and direct cost shifts. CSAC recently released an analysis showing that counties are facing between $6 billion and $9.5 billion in anticipated annual costs as a result of H.R. 1.

Unfortunately, the Governor's Budget does not include any funding for counties to address these significant cost increases. In addition, with this IHSS proposal, it actually compounds the county fiscal pressures by shifting additional safety net costs. This proposal further jeopardizes the safety net, as counties cannot backfill federal funding from H.R. 1 implementation, especially if additional state cuts are layered on top of those impacts. Counties are the safety net providers in California performing the on-the-ground work to enroll and serve vulnerable families, children, and older adults and need a partnership with the state to address H.R. 1 costs and not create additional safety net concerns.

Demographic changes are causing hours growth

There are two state-mandated and validated tools, the Functional Index Rankings and Hourly Task Guidelines, that county social workers use to determine the number of IHSS hours to authorize for a recipient. The guidelines have time ranges that provide for allowable and appropriate variation in hours for the same functional index score. The use of these tools is overseen by the California Department of Social Services (CDSS) and counties use them in accordance with CDSS guidance and a rigorous quality assurance process. The increase in hours per case is not caused by counties inappropriately using these tools, but rather the result of a number of factors outside of the control of counties.

According to an analysis from the County Welfare Directors Association (CWDA), IHSS hours per case are growing because of changing demographics and program participation, primarily three changes:

1. There are more older adults in the IHSS program and they are living for longer. As older adults continue to age, their assistance needs grow, but not always significantly enough to change their functional index score. It is appropriate for increased hours to be authorized to meet their increased needs even if their functional index score remains the same.
2. There has also been a significant increase in the number of minors who receive IHSS services. For minors, hours are not authorized for certain tasks that are expected for

their developmental stage, but as they grow and require help for those tasks, those hours can then be authorized even if their functional index score remains the same.
3. There continues to be an increase in protective supervision cases, which receive the maximum number of authorized hours.

The hours growth that is occurring is consistent with these demographic changes and was occurring prior to the establishment of the 2019 MOE. In fact, in the SB 90: 1991 Realignment Report that recommended the current MOE structure, the Department of Finance acknowledges that there is growth in hours per case and that the primary cause of this growth is the increasing disabled and protective supervision caseload.

<u>IHSS proposal would negatively impact recipients and providers</u>
CSAC has significant concerns that this IHSS assessed hours proposal would result in negative impacts to program participants and IHSS providers given the significant fiscal strain it would put on county safety net services. This proposal would create a situation with a misaligned incentive for counties to reduce or limit service hours that are legitimately needed by recipients to remain safely in their homes. It would also make it difficult to continue the substantial progress by counties to increase wages and benefits for IHSS providers that has occurred under this MOE. In fact, this proposal is likely to create a chilling effect on collective bargaining efforts. Finally, the structure proposed in the trailer bill language is problematic. The concept of a statewide average creates a situation whereby counties, and therefore the recipients and providers in those counties, are punished by their demographics causing their hours growth to be above the statewide average.

For all of these reasons, CSAC urges the Legislature to reject the IHSS assessed hours proposal. Counties are committed to this life-saving program that helps vulnerable individuals remain safely in their homes and seek your partnership in protecting this program from this harmful proposal.

Sincerely,

Justin Garrett
Senior Legislative Advocate

cc: The Honorable John Laird, Chair, Senate Budget and Fiscal Review Committee
Honorable Members, Senate Budget Subcommittee No. 3
Elizabeth Freeman, Consultant, Senate Budget and Fiscal Review Committee
Megan De Sousa, Budget Consultant, Senate Republican Caucus
Mareva Brown, Principal Consultant, Office of the Senate President Pro Tempore
Ginni Bella Navarre, Deputy Legislative Analyst, Legislative Analyst's Office
Claire Ramsey, Chief Deputy Director, California Department of Social Services
Samantha Lui, Deputy Secretary, California Health and Human Services Agency
Kris Cook, Program Budget Manager, Department of Finance
Paula Villescaz, Deputy Legislative Secretary, Office of Governor Newsom

March 27, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended March 26, 2026)*

Dear Chair Smallwood-Cuevas:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, Association of California Healthcare Districts, League of California Cities, Association of California School Administrators, and California Association of School Business Officials, write in respectful opposition to Senate Bill (SB) 947, which would complicate the routine work of local governments and educational agencies, while increasing expenses, without a clear need.

Prior Legislation and Prior Veto
SB 947 is a successor to last year's SB 7 (McNerney), which was vetoed by Governor Newsom. In the Governor's Veto Message, he stated:

> *However, rather than address specific way employers misuse this technology, the bill imposes unfocused notification requirements on any business using even the most innocuous tools. The proposed solution fails to directly address incidents of misuse.*

Indeed, local governments have not been provided with specific examples of their misuse of these technologies.

We acknowledge that SB 947 does not contain pre-use notification requirements as SB 7 did. However, SB 947 takes important and costly steps backwards from the enrolled version of SB 7, directly implicating the concerns raised by the Governor. Specifically, SB 7's human review and post-use notification requirements applied when an employer **"primarily relied"** on the ADS to **"make"** a discipline, termination, or deactivation decision. SB 947 expands these requirements to when an employer merely **"uses"** an ADS to **"assist"** in making such decisions, thus significantly increasing the scope and scale of covered employer actions. Further, SB 7 required a human reviewer to review the ADS output, and

compile and review other information that is relevant to the decision, if any. In contrast, SB 947 requires the employer to direct a human reviewer to conduct an **"independent investigation"** and compile corroborating and supporting information. Corroboration is now required for any use of an ADS output to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. The combination of increasing the scope of the bill, and increasing the burdens of compliance, will deter local governments from using these important emerging technologies and increase their litigation risk.

SB 947 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 are significant.

SB 947 is an Unfunded Mandate on State and Local Budgets
The initial and ongoing obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. Some small agencies and departments may struggle to comply with the bill's requirements. The bill requires the employer to provide, on request, a copy of the most recent 12 months of the worker's own data primarily used by an ADS to make a discipline, termination, or deactivation decision, once per year, together with detailed information and requirements to protect third parties. Complying with, and potentially analyzing, these voluminous data requests will divert public resources from core responsibilities.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For public employers with represented workforces, collective bargaining agreements already provide mechanisms for appealing personnel decisions. This bill's enforcement provisions overlay appeal rights for public employees that could create confusion, workload redundancy, and legal uncertainty. The bill also defines an "employer" subject to its provisions to also include all branches of state government (see Proposed Labor Code Section 1520(d)(1)). With the state and local agencies grappling with a substantial and growing decline in support from the federal government for a variety of programs and services, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Applying SB 947 to Public Employers May Lead to Unintended Consequences
Local governments and educational agencies are responsible for essential services including operating and securing critical infrastructure, jails, hospitals, police and fire departments, and of course public education. They may use an ADS to support and enhance these functions but SB 947 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, could trigger the bill's significant requirements if the ADS output is used to make a discipline, termination, or deactivation decision – a line which may not always be clear, but which is critical due to resulting notification and human review requirements. 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 requirements, 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.

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.

Collective Bargaining Agreement Exception Does Not Resolve Our Concerns
Rather than resolving concerns, the bill's Collective Bargaining Agreement (CBA) exemption creates new problems by requiring that agreements waive the provisions of the bill and provide 'protections from algorithmic management' to qualify. As an example, in health care settings, this could be misinterpreted to place essential systems and tools—needed for core operations—into collective bargaining negotiations, potentially making their use incompatible with their intended purpose and undermining public health care delivery. Further, either complying with the statutory requirements of this bill, or agreeing to a CBA that addresses the same issue in this bill, would effectively narrow or remove the issue from bargaining.

Put simply, for public employers, the burdens potentially imposed by this bill far exceed the benefits and purported need.

For these reasons, our organizations must respectfully oppose SB 947. 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
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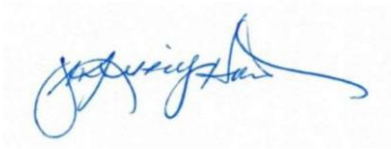
Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties
ejungwirth@counties.org



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Mishaal Gill
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Association of School Business Officials
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CC:

The Honorable Jerry McNerney
Honorable Members, Senate Labor, Public Employment and Retirement Committee
Alma Perez, Chief Consultant, Senate Labor, Public Employment and Retirement Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

DISTRICT 1 JOSE MEDINA | DISTRICT 2 KAREN SPIEGEL | DISTRICT 3 CHUCK WASHINGTON | DISTRICT 4 V. MANUEL PEREZ | DISTRICT 5 YXSTIAN GUTIERREZ

January 22, 2026

The Honorable David Alvarez
California State Assembly, District 30
1021 O Street, Suite 5320
Sacramento, CA 95814

Re: AB 35 (Alvarez) Safe Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024: Administrative Procedure Act: exemption: program guidelines and selection criteria. As Amended 1/14/26--SUPPORT

On behalf of the County of Riverside, I write to thank you for introducing AB 35, which would exempt Proposition 4 funding from the Administrative Procedure Act (APA), as the measure comes before the Assembly for a floor vote.

California voters overwhelmingly approved Proposition 4 with the clear expectation that critical investments in water, climate resilience, wildfire prevention, and natural resource protection would be delivered efficiently and without unnecessary delay. AB 35 aligns with that voter intent by ensuring that Proposition 4 funds can be deployed in a timely, effective, and fiscally responsible manner.

Providing a full APA exemption for Proposition 4 is consistent with long-standing precedent established under prior natural resource bonds, including Propositions 84 and 68. Without this exemption, state agencies have indicated that APA rulemaking and Office of Administrative Law review could delay funding awards by 12 to 18 months, undermining the urgency of addressing pressing challenges such as groundwater recharge, water recycling, drinking water reliability, and wildfire prevention—many of which directly affect Inland Empire communities.

From a local government perspective, these delays create real consequences. Existing programs were developed and implemented under the frameworks established by

earlier bonds, and they are best positioned to move funds quickly to shovel-ready projects. Requiring those programs to be restructured solely to comply with newly imposed APA requirements would introduce unnecessary administrative burdens and reduce flexibility, ultimately slowing project delivery and limiting the ability to braid funding sources to meet regional and statewide goals.

An APA exemption does not diminish transparency or public accountability. Agencies administering Proposition 4 funds will continue to operate under robust fiscal controls, reporting requirements, and oversight mechanisms, many of which already include established public engagement processes. AB 35 simply streamlines implementation, promotes consistency across programs, and removes avoidable barriers that delay investments voters clearly supported.

The County of Riverside strongly supports AB 35 and is urging our own delegation to support passage on the Assembly Floor. This legislation is essential to honoring voter intent, accelerating project delivery, and ensuring that Proposition 4 investments reach communities when they are needed most.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members of the Inland Empire Legislative Caucus

March 11, 2026
The Honorable Tina McKinnor
Chair, Assembly Public Employment
and Retirement Committee
1020 N Street, Room 153
Sacramento, CA 95814

RE: **AB 1564 (Ahrens) Employer-Employee Relations Confidential Communications.**
OPPOSE *(As Amended February 25, 2026)*

Dear Chair McKinnor,

The California Special Districts Association (CSDA), League of California Cities (Cal Cities), California State Association of Counties (CSAC), 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 Association of School Business Officials (CASBO), the California Association of Recreation and Park Districts (CARPD), Small School Districts' Association (SSDA), and the University of California, write in respectful opposition to Assembly Bill (AB) 1564. 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 Unsuccessful Legislation and Previous Veto
Our concerns with AB 1564 are consistent with the issues raised in response to previously introduced legislation, AB 340 (Ahrens, 2025), AB 1109 (Kalra, 2025), AB 2421 (Low, 2024), AB 418 (Kalra, 2019), AB 3121 (Kalra, 2018), and AB 729 (Hernandez, 2013). 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 1564 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 1564 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 1564 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 1564 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 1564 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 1564 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 1564 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 1564 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 1564 will create a problematic scenario wherein a TRO may be obtained but an employer could not fully investigate the underlying facts. AB 1564 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 that are manifesting 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 1564, 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 1564'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 1564 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 1564. 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
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Sarah Dukett
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sdukett@rcrcnet.org

Johnnie Piña
Legislative Advocate
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Dorothy Johnson
Legislative Advocate
Association of California School Administrators
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Sarah Bridge
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Mishaal Gill
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Nick Romley
Legislative Advocate
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Tyler Aguilar
Legislative Director, Business Operations
State Governmental Relations
University of California,
Office of the President
Tyler.Aguilar@ucop.edu

CC:

The Honorable Patrick Ahrens
Honorable Members, Assembly Public Employment and Retirement Committee
Michael Bolden, Chief Consultant,
Assembly Public Employment and Retirement Committee
Suzanne Sutton, Director, Assembly Republican Caucus

March 26, 2026
The Honorable Buffy Wicks
Chair, Assembly Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: **AB 1564 (Ahrens) Employer-Employee Relations Confidential Communications.**
OPPOSE *(As Amended February 25, 2026)*

Dear Chair Wicks,

The California Special Districts Association (CSDA), League of California Cities (Cal Cities), California State Association of Counties (CSAC), 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 Association of School Business Officials (CASBO), the California Association of Recreation and Park Districts (CARPD), Small School Districts' Association (SSDA), the University of California, Public Risk Innovation, Solutions, and Management (PRISM), California Association of Joint Powers Authorities (CAJPA), California County Superintendents, California School Boards Association (CSBA), and Chief Executive Officers of the California Community Colleges (CEOCCC) Board, write in respectful opposition to Assembly Bill (AB) 1564. 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 Unsuccessful Legislation and Previous Veto
Our concerns with AB 1564 are consistent with the issues raised in response to previously introduced legislation, AB 340 (Ahrens, 2025), AB 1109 (Kalra, 2025), AB 2421 (Low, 2024), AB 418 (Kalra, 2019), AB 3121 (Kalra, 2018), and AB 729 (Hernandez, 2013). 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 1564 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 1564 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 1564 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. AB 1564 contains legislative findings attempting to refute some of the significant costs identified in the Senate Appropriations Committee's analysis of last year's version of this bill, AB 340, prior to that bill being held on the committee's suspense file. However, those findings do nothing to change the substance of the bill itself, which is otherwise the same as AB 340. This bill is not a path to savings; it is an invitation to new unfair labor practice charges, grievances, and litigation.

Inconsistent with PERB Decision
AB 1564 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 1564 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 1564 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 1564 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 1564 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 1564 will create a problematic scenario wherein a TRO may be obtained but an employer could not fully investigate the underlying facts. AB 1564 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 that are manifesting 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 1564, 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 1564'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 1564 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 1564. 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
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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
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Small School Districts' Association
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Brianna Bruns
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California County Superintendents
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Dylan Hoffman
Legislative Advocate
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Andrew Martinez
Director of Government
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Chief Executive Officers of the
California Community Colleges
(CEOCCC) Board
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Faith Borges
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California Association of Joint Powers
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Chris Reefe
Legislative Director
California School Boards Association
creefe@csba.org

CC:

The Honorable Patrick Ahrens
Honorable Members, Assembly Appropriations Committee
Irene Ho, Deputy Chief Consultant, Assembly Appropriations Committee
Suzanne Sutton, Director, Assembly Republican Caucus

March 5, 2026

The Honorable Alex Lee
Chair, Assembly Human Services Committee
1021 O Street, Suite 6330
Sacramento, CA 95814

RE: Assembly Bill 1618 (Rogers): Food Insecurity Survey
As Introduced – SUPPORT
Set for Hearing March 10, 2026 in Assembly Human Services Committee

Dear Chair Lee:

On behalf of the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write in support of Assembly Bill 1618 by Assemblymember Rodgers, which would establish a statewide food insecurity data collection program administered by the California Department of Social Services (CDSS).

Urban and rural counties alike are vitally concerned about access to food because restricting food access worsens health, housing, economic, and child welfare outcomes – all of which will ripple across the safety net services that counties administer on the state's behalf.

Since 1997, the United States Department of Agriculture (USDA) has collected data through the Current Population Survey Food Security Supplement (CPS-FSS) to produce the annual Household Food Security Report survey. The Report provides statistics on household food insecurity for families across America, supplying consistent and measurable data to inform public policy. On September 20, 2025, the USDA announced the termination of future Household Food Security Reports.

AB 1618 would replace the gap left by the discontinuation of the USDA Household Food Security Survey by requiring California to do its own survey of food insecurity, allowing the state to map food insecurity in California. The data collected would be used by counties, food banks, food distribution centers, social services, and inform state and local decision-making.

Food insecurity is likely to grow across California as the impacts from H.R. 1 continue. CDSS estimates that at least 954,800 CalFresh recipients will be subject to the work requirement and time limit, 69.7% of whom may be at risk of losing CalFresh. We know 1) that this population is disproportionately Black and Latino; 2) have documented, significant barriers such as lack of transportation, identification, and re-entering from the justice system; and 3) many are people experiencing homelessness, veterans, or former foster youth. As we develop public policy solutions to address hunger, data about food insecurity will be critical.

For these reasons, UCC and RCRC supports AB 1618 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
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916-447-4806

cc: The Honorable Chris Rogers, Member, California State Assembly
Members and Consultants, Senate Human Services Committee

March 11, 2026

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

Re: **AB 1883 (Bryan): Workplace surveillance tools.**
As introduced February 12, 2026 – OPPOSE
To be heard in Assembly Committee on Labor and Employment March 18, 2026

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), League of California Cities (Cal Cities), and the Association of California Healthcare Districts (ACHD), we write in respectful opposition to AB 1883 (Bryan), which could 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.

We have fundamental concerns with this and other bills that aim to restrict how public agencies can use the tools defined as "workplace surveillance tools," which we believe are essential and, in many cases, routine tools used for security.

- We oppose any legislation that will compromise health, safety, and security for our employees, the public we serve, and our officials.
- We oppose any legislation that compromises our ability to conduct investigations into fraud, waste, or abuse.
- We do not believe it is appropriate to regulate tools used for security and basic operations in response to private sector labor concerns. State law has protected the right of public employees to bargain and public employees have a property interest in their position that is protected by due process[1].

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

AB 1883 would impose several rules on how public agencies may use surveillance tools – a term that is vast in its application, including video cameras, ID badge or key fob access, digital workplace messaging collaboration platforms (e.g. Microsoft Teams or Slack), and a wide array of tools used to keep workplaces safe, conduct essential government services, and protect against abuse, fraud, and waste of public resources.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life, particularly as new technologies emerge. However, we are concerned that this bill and others aimed at limiting employer surveillance are too broad, too expensive, and too dangerous for public agencies and those we serve.

Could prohibit routine security or public health tools

It is unclear how a court could interpret the meaning of this bill. While we understand and sympathize with the concerns this bill intends to address, our concern is that a reasonable interpretation could blanketly prohibit routine tools used for security, operations, or public health.

Routine security tools like security cameras, key fobs, ID badges, digital workplace collaboration platforms (e.g. Teams or Slack), or GPS trackers passively collect worker data, including when they are actively working at a computer or cell phone or where they are at a given point in a day. Section 1581(a)(1)(B) **prohibits** any tool that identifies or infers information about workers engaging in activity protected by state or federal law.

We believe it is critical to protect the civil and labor rights of the public workforce. Our concern is that an overbroad interpretation of what it means to "identify," or "infer," worker information could endanger essential tools that, while not *designed* or *used* to intentionally undermine the rights of employees, may passively collect information that happens to meet the law's threshold for an outright ban on their use.

While some technologies identified in the bill conjure images from science fiction, we are concerned that their breadth could sweep in routine or innocuous technologies and have other unforeseen operational or safety consequences for public agencies.

Inappropriately applies to public agencies
The sponsors are advancing this bill, in part, to address activities by employers that undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union organizing and bargaining 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.

Exposes public agencies to severe litigation risk and steep penalties
AB 1883 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague, sweeping, and littered with unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per employee for each violation. The County of Los Angeles employs over 100,000. A single violation to the county would cost upwards of $50,000,000.

Put simply, existing law already protects the civil and labor rights of the public workforce. We are concerned this bill could have unintended consequences that limit or prohibit essential tools used to keep employees and the public safe and thriving.

For these reasons, we are firmly **opposed** to AB 1883 and urge your "NO" vote.

Sincerely,

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
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Aaron Avery
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Johnnie Piña
Legislative Advocate
League of California Cities
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CC: The Honorable Isaac Bryan, Member, California State Assembly
Members and Consultants, Assembly Committee on Labor and Employment
Megan Lane, Chief Consultant, Assembly Committee on Labor and Employment
Rose Rastbaf, Policy Consultant, Assembly Republican Caucus

March 11, 2026

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

Re: **AB 1898 (Schultz): Workplace artificial intelligence tools.**
As introduced February 12, 2026 – OPPOSE
To be heard in Assembly Committee on Labor and Employment March 18, 2026

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), League of California Cities (CalCities), and the Association of California Healthcare Districts (ACHD), we write in respectful opposition to AB 1883 (Schultz), 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.

We have fundamental concerns with this and other bills that aim to restrict how public agencies can use tools which we believe are essential and, in many cases, routine tools used for security.

- We oppose any legislation that will compromise health, safety, and security for our employees, the public we serve, and our officials.
- We oppose any legislation that compromises our ability to conduct investigations into fraud, waste, or abuse.
- We do not believe it is appropriate to regulate tools used for security and basic operations in response to private sector labor concerns. State law has protected the right of public employees to bargain and public employees have a property interest in their position that is protected by due process[1].

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

AB 1898 would impose several rules on how public agencies may use surveillance tools – a term that is vast in its application, including video cameras, ID badge or key fob access, workplace messaging applications (e.g. Microsoft Teams or Slack), and a wide array of tools used to keep workplaces safe, conduct essential government services, and protect against abuse, fraud, and waste of public resources.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life, particularly as new technologies emerge. However, this bill and others aimed at limiting employers' use of critical technology are too broad, too expensive, and too dangerous for public agencies and those we serve.

Allows veto of security tool by single employee or contractor

AB 1898 would require public agencies to provide a written notice that a workplace AI/ADS tool was used to assist the employer in making employment-related decisions or to surveil the workplace. They must notify employees, exclusive representatives, and independent contractors, likely to be directly or indirectly affected, at least 90 days before introducing a workplace AI tool, which includes both a workplace surveillance tool and an automated decision system, and notify new employees and contractors upon hire, or within a month after the bill takes effect for tools already used in the workplace. The bill then requires notice to all employees and independent contractors at least once annually.

The notice must contain, among other things, detailed information on the workplace surveillance tool or automated decision system justification, uses, worker data information including description, collection, storage, access, and uses, detailed technical and other information about the workplace surveillance tool or automated decision system, a description of the general locations and the specific activities, communications, and job roles that will be surveilled and the technologies that will be used, quota information, training information, and information about whether any jobs or job tasks will be replaced or automated by the technology.

Proposed Labor Code § 1601(c) allows a single employee or independent contractor to veto the use of tools used for essential security, operational, or office functions, including security cameras or work email. The bill not only requires notice to employees, but this section **prohibits the use** of AI/ADS or a "workplace

surveillance tool," **until workers sign and return a notice**. This provision alone raises profound concerns for the security and operations of public agencies and the public at large. A single individual could, intentionally or not, prevent a school from using emergency alerts, turn off security cameras at an election facility, or allow police officers to stop using body cameras.

It also raises significant concerns regarding the labor rights of the public workforce, as a single independent contractor could overrule the decisions of the public workforce for an agency, even if the use of certain tools has been bargained in an MOU. This raises significant concerns regarding the rights of public employees and could place public agencies with the choice of violating MOUs and the Meyers-Milias-Brown Act or facing the steep penalties that would be imposed through this bill.

Endangers public resources

Section 1601(f) requires public agencies to notify employees about how a surveillance tool is used, including the purpose of a surveillance tool, the make and model of the tool to be used, the job roles to be monitored, the locations where they will be monitored, which technologies will be used, and how often they will be used. Many of these requirements will frustrate routine uses of technology and undercut public agencies' efforts to secure their facilities, public data, finances, and protect employees and the public alike.

Undermines fraud and abuse prevention and investigation

Public agencies are responsible for delivering essential public services and protecting against fraud, waste, and abuse of public resources. Imagine a public agency is concerned that an employee is committing fraud by creating a shell company and signing false invoices used to pay for lavish gifts and cash[2]. Under section 1601(f)(6), the agency would be required to inform the employee about what tools they are using to investigate them, inform them about job roles they are monitoring, which technologies will be used, and why they are using them. Put simply, AB 1898 could make the fraudster aware that they are being investigated, how they are being investigated, and why they are being investigated.

These same concerns apply to necessary efforts by public agencies to investigate claims of abuse of minors, excessive force, workplace violence, stalking, harassment, threats to public officials, or corruption.

[2] https://www.justice.gov/usao-edca/pr/former-state-employee-sentenced-over-5-years-prison-2m-scheme-defraud-office-aids

Exposes government agencies to physical and cybersecurity risks
Section 1601(f)(7) would require public agencies to include the specific make and model of each AI/ADS and workplace surveillance tool. Disclosure of this information, along with the requirements to report the locations, could provide a material advantage to bad actors seeking to exploit vulnerabilities or gaps in security 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 providing behavioral health services and shelters for the unhoused.

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, and benefits officers, among myriad other examples.

Reporting and publication of the detailed information required by AB 1898 could set back public employers' efforts to protect employees and the public.

Inappropriately applies to public agencies
The sponsors are advancing this bill, in part, to address activities by employers that undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union organizing and bargaining 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.

Exposes public agencies to severe litigation risk and steep penalties
AB 1898 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague, sweeping, and littered with unintended consequences. In addition to punitive damages and attorney fees, this

bill could cause public agencies to incur staggering penalties of $500 per employee for each violation. The County of Los Angeles employs over 100,000. A single violation to the county would cost upwards of $50,000,000.

Put simply, public agencies use the tools restricted by this bill to protect public resources, not to influence employee organization activities. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1898 and urge your "NO" vote.

Sincerely,

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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Sarah Bridge
Vice President, Advocacy & Strategy
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Aaron Avery
Director of State Legislative Affairs
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Johnnie Piña
Legislative Advocate
League of California Cities
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CC: The Honorable Nick Schultz, Member, California State Assembly
Members and Consultants, Assembly Committee on Labor and Employment

Megan Lane, Chief Consultant, Assembly Committee on Labor and Employment
Rose Rastbaf, Policy Consultant, Assembly Republican Caucus

March 20, 2026

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

Re: **AB 1898 (Schultz): Workplace artificial intelligence tools.**
As amended March 12, 2026 – OPPOSE
To be heard in Assembly Committee on Privacy and Consumer Protection on March 25, 2026

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), League of California Cities (Cal Cities), the Association of California Healthcare Districts (ACHD), Association of California School Administrators (ACSA), California Association of School Business Officials (CASBO), and Public Risk Innovation, Solutions, and Management (PRISM), we write in respectful opposition to AB 1898 (Schultz), 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.

We have fundamental concerns with this and other bills that aim to restrict how public agencies can use tools which we believe are essential and, in many cases, routine tools used for security.

- We oppose any legislation that will compromise health, safety, and security for our employees, the public we serve, and our officials.
- We oppose any legislation that compromises our ability to conduct investigations into fraud, waste, or abuse.
- We do not believe it is appropriate to regulate tools used for security and basic operations in response to private sector labor concerns. State law has protected the

> right of public employees to bargain and public employees have a property interest in their position that is protected by due process[1].

AB 1898 would impose several rules on how public agencies may use surveillance tools – a term that is vast in its application, including video cameras, ID badge or key fob access, workplace messaging applications (e.g. Microsoft Teams or Slack), and a wide array of tools used to keep workplaces safe, conduct essential government services, and protect against abuse, fraud, and waste of public resources.

We understand the reasonable concerns one could have about the slow creep of surveillance tools into every aspect of daily life, particularly as new technologies emerge. However, this bill and others aimed at limiting employers' use of critical technology are too broad, too expensive, and too dangerous for public agencies and those we serve.

Allows veto of security tool by single employee or contractor

AB 1898 would require public agencies to provide a written notice that a workplace AI/ADS tool was used to assist the employer in making employment-related decisions or to surveil the workplace. They must notify employees, exclusive representatives, and independent contractors, likely to be directly or indirectly affected, at least 90 days before introducing a workplace AI tool, which includes both a workplace surveillance tool and an automated decision system, and notify new employees and contractors upon hire, or within a month after the bill takes effect for tools already used in the workplace. The bill then requires notice to all employees and independent contractors at least once annually.

The notice must contain, among other things, detailed information on the workplace surveillance tool or automated decision system justification, uses, worker data information including description, collection, storage, access, and uses, detailed technical and other information about the workplace surveillance tool or automated decision system, a description of the general locations and the specific activities, communications, and job roles that will be surveilled and the technologies that will be used, quota information, training information, and information about whether any jobs or job tasks will be replaced or automated by the technology.

Proposed Labor Code § 1601(c) allows a single employee or independent contractor to veto the use of tools used for essential security, operational, or office functions, including security cameras or work email. The bill not only requires notice to employees, but this section **prohibits the use** of AI/ADS or a "workplace surveillance tool," **until workers sign and return a notice**. This provision alone raises profound concerns for the security and operations of public agencies and the public at large. A single individual could, intentionally or not, prevent a school from using emergency alerts, turn off security cameras at an election facility, or allow police officers to stop using body cameras.

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

It also raises significant concerns regarding the labor rights of the public workforce, as a single independent contractor could overrule the decisions of the public workforce for an agency, even if the use of certain tools has been bargained in an MOU. This raises significant concerns regarding the rights of public employees and could place public agencies with the choice of violating MOUs and the Meyers-Milias-Brown Act or facing the steep penalties that would be imposed through this bill.

Endangers public resources
Section 1601(f) requires public agencies to notify employees about how a surveillance tool is used, including the purpose of a surveillance tool, the make and model of the tool to be used, the job roles to be monitored, the locations where they will be monitored, which technologies will be used, and how often they will be used. Many of these requirements will frustrate routine uses of technology and undercut public agencies' efforts to secure their facilities, public data, finances, and protect employees and the public alike.

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Public agencies are responsible for delivering essential public services and protecting against fraud, waste, and abuse of public resources. Imagine a public agency is concerned that an employee is committing fraud by creating a shell company and signing false invoices used to pay for lavish gifts and cash[2]. Under section 1601(f)(6), the agency would be required to inform the employee about what tools they are using to investigate them, inform them about job roles they are monitoring, which technologies will be used, and why they are using them. Put simply, AB 1898 could make the fraudster aware that they are being investigated, how they are being investigated, and why they are being investigated.

These same concerns apply to necessary efforts by public agencies to investigate claims of abuse of minors, excessive force, workplace violence, stalking, harassment, threats to public officials, or corruption.

Exposes government agencies to physical and cybersecurity risks
Section 1601(f)(7) would require public agencies to include the specific make and model of each AI/ADS and workplace surveillance tool. Disclosure of this information, along with the requirements to report the locations, could provide a material advantage to bad actors seeking to exploit vulnerabilities or gaps in security 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

[2] https://www.justice.gov/usao-edca/pr/former-state-employee-sentenced-over-5-years-prison-2m-scheme-defraud-office-aids

governments are responsible for securing and operating critical infrastructure, jails, hospitals, police and fire departments, and providing behavioral health services and shelters for the unhoused.

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, and benefits officers, among myriad other examples.

Reporting and publication of the detailed information required by AB 1898 could set back public employers' efforts to protect employees and the public.

Inappropriately applies to public agencies
The sponsors are advancing this bill, in part, to address activities by employers that undermine efforts to organize a union, influence union elections, or retaliate against union leaders. Existing law already provides significant protections for public employee union organizing and bargaining 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.

Exposes public agencies to severe litigation risk and steep penalties
AB 1898 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague, sweeping, and littered with unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per employee for each violation. The County of Los Angeles employs over 100,000. A single violation to the county would cost upwards of $50,000,000.

Put simply, public agencies use the tools restricted by this bill to protect public resources, not to influence employee organization activities. We urge the author to amend the bill to remove public agencies entirely from its provisions.

For these reasons, we are firmly **opposed** to AB 1898 and urge your "NO" vote.

Sincerely,

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Dorothy Johnson, Legislative Advocate
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Mishaal Gill
Director of Policy and Advocacy
California Association of School Business Officials
mgill@casbo.org

CC: The Honorable Nick Schultz, Member, California State Assembly
Members and Consultants, Assembly Committee on Privacy and Consumer Protection
Josh Tosney, Chief Consultant, Assembly Committee on Privacy and Consumer Protection
Liz Enea, Policy Consultant, Assembly Republican Caucus

April 13, 2026

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

Re: **Assembly Bill 1961 (Ahrens). Civil actions: protective orders: workplace violence.**
As Amended March 27, 2026 – SUPPORT
To be heard in Assembly Committee on Judiciary on April 14, 2026

Dear Chair Kalra,

On behalf of the California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (Cal Cities), and California Association of Joint Powers Authorities (CAJPA), we write in support of Assembly Bill 1961 (Ahrens), related to workplace violence restraining orders. This measure seeks to provide employers with additional tools to address threats targeting employees through existing mechanisms and closes a gap in current law.

Under current law, employers may seek workplace violence restraining orders on behalf of employees who face harassment, unlawful violence, or credible threats of violence, so long as the threat is reasonably connected to the workplace. However, this requires the naming of a specific individual or individuals who have been threatened. This approach works effectively when the circumstances match the requirements set forth in filing process. However, public agencies are often subject to threats aimed at groups or a worksite location and not a named individual.

Public agencies have seen an unfortunate rise in hostility and threats form the public. In recent years, county registrars have faced bomb threat[1]and mailing of substances that are either harmful or designed to appear harmful[2]. These incidents have a real impact on employees' sense of safety and security even when an individual is not named.

AB 1961 addresses this problem by changing the definition of "employee" in the Civil Code of Procedure to encompass specific groups of workers based on their worksite locations. This change aims to reflect the real circumstances of the threats' intended audience or target.

We are committed to providing safe working conditions and secure worksites. AB 1961 furthers that commitment by providing an additional, meaningful mitigation step to stem future threats, escalation of threats, or even potential acts against employees. On behalf of the undersigned organizations, we respectfully request your AYE vote.

Sincerely,

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Faith Borges
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[1] LA County election office receives latest in series of bomb threats (ABC News 7 | November 9, 2024)
[2] Presumptively Dangerous Substance Found in California County Elections Office (Secretary of State | January 17, 2024)

Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

CC: The Honorable Patrick Ahrens, Member, California State Assembly
Members and Consultants, Assembly Committee on Judiciary
Nicholas Liedtke, Chief Counsel, Assembly Committee Judiciary
Liz Enea, Policy Consultant, Assembly Republican Caucus

March 25, 2026

The Honorable Matt Haney
Chair, Assembly Committee on Housing and Community Development
1020 N St Room 156
Sacramento, CA 95814

RE: AB 2002 Local government assistance: Regional Early Action Planning Fund. As Introduced 2/17/2026 – Notice of Support

Dear Chair Haney,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, the League of California Cities (CalCities), the Urban Counties of California (UCC), the American Planning Association, California Chapter (APA), and the Rural County Representatives of California (RCRC) we write to express our support for AB 2002 (Solache), which codifies the Regional Early Action Planning (REAP 1.0) program, providing a critically needed framework to support state, regional, and local housing planning responsibilities.

California's cities and counties continue to face a severe and long-standing housing shortage. Meeting the state's housing needs requires robust, data-driven planning, strong intergovernmental coordination, and reliable tools that help local jurisdictions produce and preserve housing at all income levels. AB 2002 directly supports this goal by codifying a proven program that has already helped cities and regional governments modernize planning, enhance technical capacity, and increase housing readiness.

At the same time, the state's Regional Housing Needs Assessment (RHNA) requirements continue to grow in complexity and cost for cities, counties and regional planning agencies. These local governments must now analyze additional income categories, conduct interviews with households with special housing needs, meet expanded equity and environmental standards, and undergo enhanced review by the Department of Housing and Community Development (HCD). These responsibilities reflect important state priorities—but they cannot be met without stable, dedicated support.

AB 2002 provides exactly that. By codifying REAP 1.0 and establishing an ongoing framework to support regional governments and local jurisdictions, the bill strengthens the foundation of California's housing planning system. It will ensure that cities and counties can continue to access critical technical assistance, data tools, and capacity-building resources necessary to meet housing and zoning obligations. Moreover, AB 2002 reinforces the integrity of the RHNA process and advances the state's long-term housing goals.

For these reasons, CSAC, CalCities, UCC, APA, and RCRC are pleased to support your bill. If you have additional questions, please contact Mark Neuburger with CSAC at mneuburger@counties.org, Brady Guertin with CalCities at bguertin@calcities.org, Tracy Rhine with RCRC at trhine@rcrcnet.org, Reuben Duarte at policy@apacalifornia.org, or Chris Lee with UCC at clee@politicogroup.com.

Thank you for your consideration.

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties

Brady Guertin
Legislative Advocate
League of California Cities

Christopher Lee
Legislative Advocate
Urban Counties of California

Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California

Reuben Duarte
Vice President Policy and Legislation
APA California

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

CC: Members and Consultants, Assembly Committee on Housing and Community Development
The Honorable José Luis Solache, California State Assembly

CSAC Officers

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Bruce Gibson
San Luis Obispo County

CEO
Graham Knaus

March 20, 2026

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

RE: Assembly Bill 2011 (Hart): Protecting Access to Mental Health and Substance Use Disorder Care
As Introduced – SUPPORT
Set for Hearing March 24, 2026 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 strong support of Assembly Bill 2011, which would codify the 2024 federal Mental Health Parity and Addiction Equity Act regulations into California law and ensure that Californians continue to have equitable access to mental health and substance use disorder services.

For more than a decade, the federal Mental Health Parity and Addiction Equity Act has sought to prevent health plans and insurers from imposing more restrictive requirements on mental health and substance use disorder treatment than those applied to medical and surgical care. However, enforcement of parity requirements has been inconsistent and difficult to implement, particularly with respect to non-quantitative treatment limits such as prior authorization standards, medical necessity criteria, network adequacy, and reimbursement policies. In 2024, updated federal rules clarified the responsibilities of health plans and insurers to collect data and conduct comparative analyses to ensure parity between behavioral health and physical health coverage. These rules strengthened oversight and improved the ability of regulators to identify and correct disparities in coverage.

Recent federal actions have created uncertainty about the continued enforcement of these standards. While California regulators have chosen to continue enforcing the 2024 rules, the potential rescission of federal regulations could undermine the authority of state regulators and weaken protections for millions of Californians who rely on behavioral health services. AB 2011 provides a straightforward and prudent solution by codifying the

existing federal standards in state law. In doing so, the bill ensures that parity protections remain in place regardless of federal policy changes.

Urban and rural counties play a central role in the delivery and coordination of behavioral health services throughout California. Our counties operate and administer critical mental health and substance use disorder programs, often serving individuals with the most complex needs. Ensuring that residents have equitable access to behavioral health care through their health coverage is essential to improving health outcomes, strengthening community well-being, and reducing strain on county safety net systems.

Importantly, AB 2011 does not create new benefit mandates or expand coverage requirements. Instead, it codifies standards that regulators are already enforcing today and provides clarity and stability for patients, providers, and regulators alike. By maintaining strong parity protections, this measure will help ensure that Californians seeking mental health and substance use disorder treatment receive coverage that is comparable to coverage for physical health conditions.

For these reasons, the UCC and RCRC support AB 2011 and urge your "aye" vote. Please do not hesitate to reach out with any questions.

Sincerely,

Kelly Brooks-Lindsey
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916-753-0844

Sarah Dukett
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RCRC
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916-447-4806

cc: The Honorable Gregg Hart, Member, California State Assembly
Members and Consultants, Assembly Health Committee

April 1, 2026

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

Re: **AB 2027 (Ward): Worker data: prohibitions: artificial intelligence.**
As amended March 16, 2026 – OPPOSE
To be heard in Assembly Committee on Labor and Employment on April 8, 2026

Dear Chair Ortega,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), Association of California Healthcare Districts (ACHD), and League of California Cities (Cal Cities) we write in respectful opposition to AB 2027 (Ward), which would cause an effective ban on the use of an artificial intelligence (AI) tool by a public agency.

We understand the reasonable concerns about the slow creep of new technologies into daily life. However, the scope of this bill is vast and could effectively ban any tool that is developed with the input of workers. Local agency employers are incorporating AI and automated decision system (ADS) technology to improve service delivery, address risks, and empower employees to focus on more meaningful work through streamlining some rote aspects of job duties. State law has protected the right of public employees to bargain, and public employees have a property interest in their position that is protected by due process[1]. Public agencies and their workforce have long bargained over the conditions of their workplace and, more frequently, we have seen MOUs include agreements on the use of AI or ADS.

A complete ban on artificial intelligence tools for the uses specified in the bill, when trained with worker data that relates to or describes how a worker performs their

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

job duties, would be detrimental to the development of tools that assist public employers in streamlining and supporting essential services, such as benefits enrollment, resume screening, timekeeping and scheduling, and even systems to detect wildfires and monitor dam safety. AI systems rely on data inputs in order to train them to work effectively. It is hard to fathom how they could function effectively without the input of the public employees and officials with firsthand knowledge of and experience on how to deliver a service or manage risks. Collectively, the terms replication, automation, and replacement, coupled with the bill's defined terms, may extend this bill's application to vast swaths of AI technology uses, including for efficiency and safety, as well as innocuous uses and legacy automated technologies.

These new tools represent a new era of service delivery. As the public sector workforce adopts new technologies, we ask that legislation not hinder the use or potential use of innovations that are already proving to support critical public sector operations.

Additionally, we have concerns regarding the bill's provision that holds employers jointly and severally liable for a vendor's breach in data security or unauthorized system access. While it is appropriate for a vendor to implement and maintain reasonable security procedures to protect worker data, employers do not control the internal systems or security practices for third party vendors, and placing the burden of liability on a public agency for actions it does not have direct control over is misplaced.

Finally, AB 2027 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague and sweeping, and which will result in unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per worker for each violation. The County of Los Angeles employs over 100,000 workers. A single violation to the county would cost upwards of $50,000,000. The bill also subjects public agencies to civil actions, opening them up to liability for punitive damages and attorney's fees. The inclusion of independent contractors in the definition of "worker" blurs the roles of employer and workers, while increasing compliance complications as well as increasing litigation risk.

We are concerned AB 2027 could have vast unintended consequences that prohibit innovation and tools used to assist employees and ensure access to public benefits.

For these reasons, we are firmly **opposed** to AB 2027 and urge your "NO" vote.

Sincerely,

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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Assembly Committee on Labor and Employment
Erin Hickey, Principal Consultant, Assembly Committee on Labor and Employment
Rose Rastbaf, Policy Consultant, Assembly Republican Caucus

April 13, 2026

The Honorable Rebecca Bauer-Kahan
Chair, Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

Re: **AB 2027 (Ward): Worker data: prohibitions: artificial intelligence.**
As amended April 9, 2026 – OPPOSE
To be heard in Assembly Committee on Privacy and Consumer Protection on April 16, 2026

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), Association of California Healthcare Districts (ACHD), Association of California School Administrators (ACSA), and League of California Cities (Cal Cities) we write in respectful opposition to AB 2027 (Ward), which sows uncertainty into how public agencies can use artificial intelligence (AI) tools and creates new restrictions for the use of third-party systems that includes a wide array of technology.

We understand the reasonable concerns about the rapid integration of new technologies into daily life. However, the scope of this bill is vast and would leave significant questions about whether agencies can use AI systems or how they could train them to perform their tasks.

Local agency employers are incorporating AI and automated decision system (ADS) technology to improve service delivery, address risks, and empower employees to focus on more meaningful work through streamlining some rote aspects of job duties. State law has protected the right of public employees to bargain, and most public employees have a property interest in their position that is protected by due

process[1]. Public agencies and their workforce have long bargained over the conditions of their workplace and, more frequently, we have seen MOUs include agreements on the use of AI or ADS.

Creates uncertainty for how AI systems can be trained

We appreciate the efforts of the author and sponsor to narrow the bill. However, the new provisions create uncertainty regarding what restrictions remain for public agencies and other employers using AI. AI systems rely on data inputs to train them to work effectively. It is hard to fathom how they could function effectively without the input of the public employees and officials with firsthand knowledge of and experience on how to deliver a service or manage risks.

While the April 9 amendments provide a narrower set of restrictions, it is not clear how the prohibition on the use of "personal information," could apply to tools already used by public agencies or that could be adopted in the near future. The amendments refer to the definition of "personal information," in Civil Code § 1798.140. That definition includes information that "…relates to…" or "…is reasonably capable of being associated with…" an individual. It is not clear where a boundary may exist for public agencies and their employees to train an AI system. Due to the bill's significant penalties, this could impose an unnecessary chilling effect on the adoption of new technologies.

Public agencies are not governed by the California Consumer Privacy Act (CCPA). This law would compel agencies to navigate a law designed for private sector activities. Public agencies are not a business and they serve the public, not consumers. Public agencies have, instead, been subject to many data privacy and confidentiality laws for decades. We believe it is more appropriate to rely on existing frameworks for data privacy and confidentiality to protect sensitive data for the public workforce.

Restrictions on replication or automation could limit tools that supplement the workforce

Collectively, the terms replication, automation, and replacement, coupled with the bill's defined terms, may extend this bill's application to vast swaths of AI technology uses, including for efficiency and safety, as well as innocuous uses and legacy automated technologies.

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

Public agencies are not interested in replacing the public workforce with machines. Public agencies do, however, believe in using new technology to better serve residents of California and improve conditions for the public workforce. Public agencies are already using these tools in ways that improve delivery of services, mitigate disaster risk, strengthen the social safety net, and empower the public workforce to grow, develop, and replace rote tasks with more meaningful work. These include use of AI systems to:

- Detect water contamination;
- Performing road maintenance triage, detection of road hazards, and identification of potholes;
- Detecting wildfires and earthquakes;
- Dam safety monitoring;
- Leak detection for water pipelines;
- Improve efficiency for public benefit enrollment and pupil attendance; and
- Accelerate permitting following disasters, including the Los Angeles wildfires.

Each of these tools are used not to replace public employees with machines, but to supplement their work. Each tool could meet the definition of *replicating* or *automating* a worker's job.

These new tools represent a new era of service delivery. As the public sector workforce adopts new technologies, we ask that legislation not hinder the use or potential use of innovations that are already proving to support critical public sector operations.

While we appreciate the intent to narrow the bill, we remain opposed due to unresolved questions about how the bill will work in practice. For public agencies, the costs are steep. The bill subjects public agencies to civil actions, opening them up to liability for punitive damages and attorney's fees. At a time when local agencies are facing mounting fiscal uncertainty due to legal liability, we have significant concerns for new courses action that can strain local agency budgets.

Finally, we believe the inclusion of independent contractors in the definition of "worker" blurs the roles of employer and workers, while increasing compliance complications as well as increasing litigation risk.

We recognize the concerns surrounding the adoption of new workplace technologies that have motivated this bill and other recent legislation. We are willing to continue engaging on legislation that addresses common goals. However,

any new policy must take into account the significant differences between public and private employers in existing state statute for represented labor, the purpose of local government agencies and that of private companies, and the where the funding will come from to accomplish the new requirements.

We are concerned AB 2027 could have vast unintended consequences that prohibit innovation and tools used to assist employees and ensure access to public benefits.

For these reasons, we must remain **opposed** to AB 2027 and urge your "NO" vote.

Sincerely,

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Johnnie Piña
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Dorothy Johnson
Legislative Advocate
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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Assembly Committee on Privacy and Consumer Protection
Slater Sharp, Senior Consultant, Assembly Committee on Privacy and Consumer Protection
Liz Enea, Policy Consultant, Assembly Republican Caucus

April 1, 2026

The Honorable Christopher Ward
California State Assembly
1021 O Street, Suite 6350
Sacramento, CA 95814

Re: **AB 2027 (Ward): Worker data: prohibitions: artificial intelligence.**
As amended March 16, 2026 – OPPOSE

Dear Assemblymember Ward,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), Association of California Healthcare Districts (ACHD), and League of California Cities (Cal Cities) we write in respectful opposition to your AB 2027, which would cause an effective ban on the use of an artificial intelligence (AI) tool by a public agency.

We understand the reasonable concerns about the slow creep of new technologies into daily life. However, the scope of this bill is vast and could effectively ban any tool that is developed with the input of workers. Local agency employers are incorporating AI and automated decision system (ADS) technology to improve service delivery, address risks, and empower employees to focus on more meaningful work through streamlining some rote aspects of job duties. State law has protected the right of public employees to bargain, and public employees have a property interest in their position that is protected by due process[1]. Public agencies and their workforce have long bargained over the conditions of their workplace and, more frequently, we have seen MOUs include agreements on the use of AI or ADS.

A complete ban on artificial intelligence tools for the uses specified in the bill, when trained with worker data that relates to or describes how a worker performs their job duties, would be detrimental to the development of tools that assist public employers in streamlining and supporting essential services, such as benefits

[1] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

enrollment, resume screening, timekeeping and scheduling, and even systems to detect wildfires and monitor dam safety. AI systems rely on data inputs in order to train them to work effectively. It is hard to fathom how they could function effectively without the input of the public employees and officials with firsthand knowledge of and experience on how to deliver a service or manage risks. Collectively, the terms replication, automation, and replacement, coupled with the bill's defined terms, may extend this bill's application to vast swaths of AI technology uses, including for efficiency and safety, as well as innocuous uses and legacy automated technologies.

These new tools represent a new era of service delivery. As the public sector workforce adopts new technologies, we ask that legislation not hinder the use or potential use of innovations that are already proving to support critical public sector operations.

Additionally, we have concerns regarding the bill's provision that holds employers jointly and severally liable for a vendor's breach in data security or unauthorized system access. While it is appropriate for a vendor to implement and maintain reasonable security procedures to protect worker data, employers do not control the internal systems or security practices for third party vendors, and placing the burden of liability on a public agency for actions it does not have direct control over is misplaced.

Finally, AB 2027 would allow employees or employee representatives to bring civil actions against public agencies for violating a law that is vague and sweeping, and which will result in unintended consequences. In addition to punitive damages and attorney fees, this bill could cause public agencies to incur staggering penalties of $500 per worker for each violation. The County of Los Angeles employs over 100,000 workers. A single violation to the county would cost upwards of $50,000,000. The bill also subjects public agencies to civil actions, opening them up to liability for punitive damages and attorney's fees. The inclusion of independent contractors in the definition of "worker" blurs the roles of employer and workers, while increasing compliance complications as well as increasing litigation risk.

We are concerned AB 2027 could have vast unintended consequences that prohibit innovation and tools used to assist employees and ensure access to public benefits.

For these reasons, we must respectfully oppose your AB 2027.

Sincerely,

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Johnnie Piña
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April 13, 2026

The Honorable Tasha Boerner
Member, California State Assembly
1021 O Street, Room 4150
Sacramento, CA 95814

RE: Assembly Bill 2170 – Oppose
As Amended March 19, 2026

Dear Assembly Member Boerner:

On behalf of the Rural County Representatives of California (RCRC), League of California Cities (Cal Cities), and California State Association of Counties, we must regretfully oppose your Assembly Bill 2170 regarding the California Environmental Quality Act (CEQA).

Assembly Bill 2170 significantly expands CEQA to require preparation of an environmental impact report (EIR), mitigated negative declaration (MND), or negative declaration (ND) for the development, operation, or substantial modification/expansion of a project on land zoned to allow industrial uses and that is in or within ½ mile of an "overburdened community." AB 2170 also requires translation of a large number of CEQA notices and documents and imposes a new obligation for local agencies to have in-person oral translation services at public hearings. Together, these requirements impose significant burdens and costs on lead agencies and project proponents and expand litigation risk for those projects.

We support CEQA's core objectives of disclosure, informing the decision-making process, and mitigating a project's significant impacts on the environment. Unfortunately, CEQA is often used for non-environmental purposes to either extract concessions from project applicants, or by interested parties to stop a project altogether. All over California, a wide variety of projects are subject to endless delays and added costs by those who use CEQA for their own non-environmental ends. We fear that AB 2170 will increase CEQA costs, complexity, and litigation risks and provide another powerful tool for opponents to challenge and undermine projects.

AB 2170 imposes new obligations and legal risks for a broad universe of projects located in or near "overburdened communities"

For projects on property zoned to allow industrial uses and located in or within ½ mile of an "overburdened community," AB 2170 requires preparation of an EIR, MND, or ND. In doing so, AB 2170 precludes the use of CEQA exemptions and significantly increases project costs, complexity, and litigation risk.

AB 2170's "overburdened community" provision is not limited to parcels *zoned* industrial, but instead applies to any project on land *zoned to allow* industrial uses. Zoning varies from jurisdiction to jurisdiction, but some non-industrial zones *allow* industrial uses either as an allowed

use or with a minor conditional use permit. As such, this provision could apply to a broad universe of ordinary projects on lands zoned for industrial, agricultural, or even commercial uses, but where some universe of industrial uses are either "allowed" either by right or with a conditional use permit. Notably, this provision targets all "projects" on those lands, not just industrial projects. Further, the Legislature has long debated the necessary distance requirements for sensitive receptors near industrial areas in a variety of bills and ½ a mile is a far-reaching measure that would result in an extremely broad radius paired with this project definition. This imprecise drafting pulls within the sweep of AB 2170 any number of housing, commercial, business, or agricultural projects occurring on parcels where industrial uses are "allowed."

Furthermore, the scope of "overburdened community" is broad and includes not only CalEnviroScreen communities, but also broad swaths of unincorporated areas where the median household income is 80% or less than the statewide median household income. This latter trigger sweeps into the scope of the bill many unincorporated rural areas, as well as rural, incorporated cities. By increasing CEQA complexity and litigation risk, we fear that AB 2170 will disincentivize the location of projects away from those areas in greatest need of economic development and towards more affluent areas, thereby ossifying economic stagnation for those residents and their communities.

While AB 2170 could be read to only preclude the use of statutory CEQA exemptions (21080.1(a)(2)(B)), one could argue that the explicit requirement to prepare an EIR, MND, or ND in 21080.1.(a)(2)(A) also precludes local agencies from using categorical exemptions. Categorical exemptions were established for projects the state determined generally do not have a significant effect on the environment. The effect of these provisions is to require local agencies and developers to perform unnecessary environmental analyses; however, the real risk is that it changes the judicial standard of review for local decisions from the deferential "substantial evidence" standard which applies to notices of exemption to the far lower "fair argument" standard that applies for MNDs and NDs and which has been exploited by project opponents and NIMBYs to delay projects for years even when there is contrary evidence in the record that a project would not have a significant impact on the environment.

Because of the broad sweep of the bill, ambiguity, lack of a definition for types of projects impacted, and imprecise crafting, AB 2170 could preclude the use of statutory exemptions for the construction of farmworker housing on agricultural land if the local government allows some types of industrial activities to occur on those lands either as an allowed use or with a minor conditional use permit. Similarly, AB 2170 could preclude the use of a CEQA exemption when issuing a discretionary permit to replace a groundwater well on land zoned for agriculture but where an industrial use like a packing operation or processing facility is allowed either by right or with a conditional use permit.

Taken together, AB 2170 will increase CEQA cost and complexity for a large universe of projects in broad regions of the state and significantly increase CEQA litigation risk for projects that otherwise would have qualified for statutory or categorical CEQA exemptions.

AB 2170 creates significant new cost pressures and litigation risks by imposing broad written and oral translation requirements for all projects

AB 2170 requires a broad array of CEQA notices, summaries, and documents to be translated into "threshold languages," a term which is itself ambiguously crafted and departs from long-standing definitions. AB 2170 does not merely apply to CEQA notices - it also includes lengthy and highly-technical information contained in EIRs. Depending on the length of the

document and number of languages into which it must be translated, these costs could be considerable. Worse yet, there is substantial risk that opponents will argue an imprecise translation in a document precluded informed decision-making, which could result in the project approval being held up for several years while the case works it way through courts and any problems are remedied.

While these AB 2170 translation costs could be considerable, there are even greater costs and implementation challenges associated with AB 2170's requirement to provide oral translation at public hearings. These challenges will be even greater for communities with multiple threshold languages or in remote areas that lack access to translators. What happens if the translator fails to show up - must the meeting be postponed? Will inaccurate live translations fail to inform public participation?

Beyond the translation challenges posed by AB 2170, the bill also imposes new requirements regarding when and where public hearings on a project must be located. These could pose logistical challenges, especially for controversial projects with large numbers of individuals wishing to participate in the hearings.

AB 2170's savings clause for inaccurate translations is inadequate

Unfortunately, the savings clause contained in AB 2170 provides very little protection against litigation. It provides that "minor translation inaccuracies" *of a document* are not a basis for invalidating a public agency decision unless the error precluded informed decision making or public participation. This will simply lead to litigation about whether an inaccuracy was minor or precluded informed public participation. That simple claim could take years to resolve in court. Worse yet, there is NO protection afforded for inaccurate oral translation, or insulation from liability if an oral translator was unavailable. CEQA is litigious enough - local agencies should not be subject to challenges based upon the content or accuracy of translations required under AB 2170.

AB 2170 imposes substantial new costs on government agencies that cannot be recovered from project applicants

AB 2170 incorrectly states that no reimbursement is required because local agencies will be able to levy service charges, fees, or assessments to recover their costs. This is simply not true. *While local agencies may be able to recover some implementation costs where there is a project applicant, AB 2170 fails to recognize that many CEQA "projects" are undertaken by local agencies themselves and so will be unable to recover costs in those instances*. Even if a local agency can recover AB 2170 implementation costs when there is a project applicant, the bill will still result in significant cost increases (and litigation risks) for housing, energy, business, and other developers.

For these reasons, we must oppose AB 2170 but remain interested in discussing pathways for translating CEQA notices without creating additional litigation risk. If you should have any questions, please do not hesitate to contact us.

Sincerely,

JOHN KENNEDY
Rural County Representatives of California
Senior Policy Advocate
jkennedy@rcrcnet.org

CHARLES DELGADO
California State Association of Counties
Legislative Advocate
cdelgado@counties.org

MELISSA SPARKS-KRANZ
League of California Cities
Legislative Advocate, Environmental Quality
msparkskranz@calcities.org

JEAN HURST
Urban Counties of California
Legislative Representative
jkh@hbeadvocacy.com

cc: The Honorable Isaac Bryan, Chair, Assembly Natural Resources Committee
Members of the Assembly Natural Resources Committee
Lawrence Lingbloom, Chief Consultant, Assembly Natural Resources Committee
John Fitzpatrick, Consultant, Assembly Republican Caucus

April 14, 2026

The Honorable Dr. Corey Jackson
Member, California State Assembly
1021 O Street, Room 6120
Sacramento, CA 95814

RE: Assembly Bill 2214 – OPPOSE
As Amended April 13, 2026

Dear Assemblymember Jackson:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), League of California Cities (Cal Cities), Urban Counties of California (UCC), and California Special Districts Association (CSDA) we must regretfully oppose your Assembly Bill 2214, which would authorize the use of local agency funds on deposit with the State Treasurer's Pooled Money Investment Account for purposes that are inconsistent with liquidity requirements of the local agencies investing in that fund.

The Local Agency Investment Fund (LAIF) is managed by the California State Treasurer's Office (STO) and invests in high-quality, low-risk securities (like U.S. Treasuries). It is part of the Treasurer's Pooled Money Investment Account (PMIA). Its purpose is to preserve capital, and the return on investment is a tertiary priority for local agencies that place deposits with LAIF. Due to the high-quality investments the STO uses for funds in PMIA, this is an ideal repository for public funds that must be protected and regularly called upon to meet near-term payments and meet near-term budgetary obligations of local agencies. Access to funds in the PMIA, including funds in LAIF, can be provided with speed—typically same day or next business day, depending on timing and size. Given the State's strict requirements on where local agencies can put public funds, LAIF is an attractive option for agencies looking to balance short, medium, and long-term investments that can also meet liquidity needs.

AB 2214 seeks to carve out $4 Billion in PMIA funds, transfer those dollars to a new fund**,** and dedicate those funds for lending activities that are not consistent with the fund's management and investors' needs. Although the measure no longer explicitly draws from LAIF, LAIF constitutes a significant portion of PMIA, and the proposal

therefore remains a source of serious concerns. The practical consequence of making changes to PMIA, as mandated in AB 2214, would be for local agencies to withdraw their funds from LAIF and find a similar option that meets their safety and liquidity requirements. This could reduce the cost efficiencies of pools as large as LAIF, thereby reducing the benefit to the taxpayer.

In addition, the PMIA Board regularly approves an agenda item to transfer tens of billions of dollars from the PMIA to the State General Fund on a short-term basis to ensure the State can meet its financial obligations, such as debt service, payroll, and payments to local governments. Legislation that would commit billions of dollars from PMIA into long-term investments, such as mortgages, should be carefully reviewed by the State Controller and the Department of Finance to ensure that adequate liquidity is maintained.

The nature of our opposition is not to a proposal that seeks to help small businesses and first-time homebuyers, but rather is to the funding mechanism, which would take local taxpayer funds for long-term lending activities when those funds are supposed to be secure and highly liquid in order for public agencies to meet debt service obligations, payroll, or other near-term financial obligations.

For these reasons, RCRC, CSAC, CalCities, UCC, and CSDA must oppose AB 2214 as currently drafted. If you should have any questions, please do not hesitate to contact us.

Sincerely,

SARAH DUKETT
Rural County Representatives of California
Senior Policy Advocate
sdukett@rcrcnet.org

EMMA JUNGWIRTH
California State Association of Counties
Senior Legislative Advocate
ejungwirth@counties.org

BEN TRIFFO
League of California Cities
Legislative Advocate
btriffo@calcities.org

JEAN HURST
Urban Counties of California
Legislative Representative
jkh@hbeadvocacy.com

MARCUS DETWILER
California Special Districts Association
Legislative Representative
marcusd@csda.net

cc: The Honorable Avelino Valencia, Chair, Assembly Banking & Finance Committee
The Honorable Juan Carrillo, Chair, Assembly Local Government Committee
Members, Assembly Banking & Finance Committee
Members, Assembly Local Government Committee
Desiree Nguyen Orth, Chief Consultant, Assembly Banking & Finance Committee
Jimmy MacDonald, Principal Consultant, Assembly Local Government Committee
Bill Lewis, Consultant, Assembly Republican Caucus
Tobias Wolken, Consultant, Assembly Republican Caucus

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

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March 10, 2026

The Honorable Natasha Johnson
California State Assembly
State Capitol
Sacramento, CA 95814

Re: County of Riverside Sponsorship of AB 2295 -Johnson
Regional Housing Need: Affordable Housing
As introduced February 19, 2026

Dear Representative Johnson:

On behalf of the County of Riverside, we are proud to sponsor AB 2295**,** legislation that will help local governments work more collaboratively to address California's housing shortage while advancing practical solutions for the production of affordable housing.

AB 2295 provides an important new tool by authorizing voluntary agreements between local governments to share Regional Housing Need Allocation (RHNA) credits for jointly funded housing developments. By allowing both the permitting jurisdiction and the financing partners to receive credit toward their state-mandated housing targets, the bill creates a meaningful incentive for cities and counties to collaborate on projects that might otherwise be difficult to complete.

As you know, every city and county in California must plan for and accommodate housing production targets assigned by the California Department of Housing and Community Development and regional councils of governments through the RHNA process. While these goals are essential to addressing the state's housing shortage, many jurisdictions—particularly geographically large and diverse counties such as Riverside—face significant challenges in meeting the targets for affordable housing across all income levels.

The high cost of infrastructure and development often makes it difficult for a single jurisdiction to independently fund and deliver large-scale affordable housing projects. In many cases, the most suitable locations for new affordable housing are within incorporated cities that already have access to water, sewer, transportation, and energy infrastructure. In recent years, the County of Riverside has invested over $100 million of housing funds into incorporated cities, generating almost $800 million in housing developments by leveraging this financing against other sources. Counties may have the financial capacity or funding tools to help support these projects, but current law provides limited mechanisms for cross-jurisdictional partnerships that allow both parties to receive credit toward their housing obligations.

AB 2295 thoughtfully addresses this gap by establishing a clear statutory framework for voluntary RHNA credit-sharing agreements between local governments. Under the bill, participating agencies may jointly fund housing developments and share the resulting RHNA credit. This approach encourages regional cooperation, leverages available public resources, and helps ensure that affordable housing is built in locations where infrastructure and services already exist.

We appreciate your leadership in advancing policies that support regional collaboration and address the housing needs of our communities. The County of Riverside is grateful for your partnership and for authoring legislation that provides local governments with the flexibility needed to make meaningful progress on one of California's most pressing challenges.

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,

Karen S. Spiegel

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members, Inland Empire Legislative Caucus

URBAN COUNTIES
OF CALIFORNIA

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

April 18, 2026

The Honorable Matt Haney, Chair
Assembly Committee on Housing and Community Development
1021 O Street, Room 5740
Sacramento, CA 95814

RE: AB 2320 (Ta) Multifamily Housing Program: Homekey: adaptive reuse
As introduced on February 19, 2026 – SUPPORT
Set for hearing in Assembly Housing & Community Development – April 22, 2026

Dear Chair Haney:

On behalf of the Urban Counties of California (UCC), I write in support of AB 2320 (Ta), which provides critical clarifications and flexibility within the Homekey+ program to better facilitate the development of permanent supportive housing.

California's urban counties strongly support the goals of Homekey+ and Proposition 1 to expand housing for individuals experiencing homelessness, including those with behavioral health needs. While we appreciate the need to quickly deliver projects, Homekey+ timelines do not currently reflect the realities of project delivery for adaptive reuse developments. While taking advantage of existing, developed sites already served by infrastructure—which are often limited, particularly in unincorporated areas— adaptive reuse projects frequently involve substantial demolition, structural reconfiguration, and major electrical and mechanical upgrades, making them more comparable to new construction rather than superficial remodeling.

Under existing program guidelines, adaptive reuse projects are subject to compressed timelines that have proven infeasible in practice. Counties working to advance adaptive reuse projects have identified feasible sites that could not proceed due to current timelines, despite significant local investment in project planning and partnership development. AB 2320 addresses this issue by aligning adaptive reuse timelines with those applicable to new construction, extending the allowable completion period to better match industry standards and real-world conditions. This targeted change will reduce barriers to participation, increase the number of eligible projects, and help ensure that Homekey+ funds are deployed efficiently to produce much-needed housing.

By improving clarity and aligning program requirements with construction realities, AB 2320 strengthens an already successful program and supports the state's broader efforts to address homelessness through the expansion of permanent supportive housing.

1127 11TH STREET,
SUITE 810
SACRAMENTO, CA 95814
916.327.7531
URBANCOUNTIES.COM

For these reasons, UCC respectfully urges your "AYE" vote on AB 2320. Please contact Chris Lee at clee@politicogroup.com with any questions about our position.

Sincerely,

Christopher Lee
Legislative Advocate

cc: Assemblymember Tri Ta
Members and Consultants, Assembly Housing and Community Development Committee

April 10, 2026

The Honorable Rebecca Bauer-Kahan
Assembly Committee on Privacy and Consumer Protection
1020 N Street, Room 162
Sacramento, CA 95814

Re: **Assembly Bill 2545 (Schiavo). Report: labor force impact: artificial intelligence.**
Support if Amended
To be heard in the Assembly Privacy and Consumer Protection Committee

Dear Chair Bauer-Kahan,

On behalf of the California State Association of Counties (CSAC) and Urban Counties of California (UCC), and the League of California Cities (Cal Cities), we write to express our "support if amended" position to Assembly Bill 2545 (Schiavo), related to the impact of artificial intelligence (AI) on California's workforce. We appreciate the Assemblymember's leadership in this area and efforts to fully understand critical information about how the introduction of AI systems impacts individual workers and labor markets broadly, along with workforce replacement and the existing and missing data collection on impacts. However, we respectfully request that local agency employers be added to the proposed advisory panel to ensure the recommendations to the Legislature reflect a more complete assessment of how AI is used in the workplace.

AB 2545 would establish the California Artificial Intelligence Worker Impact Data Assessment Project Advisory Panel to be composed of representatives from academia, AI program developers, various non-profits, and public and private labor organizations. In light of the intended goals of AB 2545 to determine accurate, comprehensive data to protect workers and support strong workforce pathways through a proactive, evidence-based approach, leaving out local public agency employers would present a major gap in any finding. Since millions of employees serve in positions with the more than 6,000 agencies representing cities, counties,

special districts and schools, the voice of local public agency employers should be included.

Thank you for your consideration of our requested amendments. We look forward to working with the author to advance this measure with an advisory body reflecting a more complete representation of voices in California's workforce stakeholders.

Sincerely,

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

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

Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

CC: The Honorable Pilar Schiavo, Member, California State Assembly
Members and Consultants, Assembly Committee on Privacy and Consumer Protection
Josh Tosney, Chief Consultant, Assembly Committee on Privacy and Consumer Protection
Liz Enea, Policy Consultant, Assembly Republican Caucus

April 10, 2026

The Honorable Pilar Schiavo
California State Assembly
1021 O Street, Room 4140
Sacramento, CA 95814

Re: **Assembly Bill 2545 (Schiavo). Report: labor force impact: artificial intelligence.**
Support if Amended

Dear Assemblymember Schiavo,

On behalf of the California State Association of Counties (CSAC) and Urban Counties of California (UCC), the League of California Cities (Cal Cities), we write to express our "support if amended" position to your Assembly Bill 2545, related to the impact of artificial intelligence (AI) on California's workforce. We appreciate your leadership in this area and efforts to fully understand critical information about how the introduction of AI systems impacts individual workers and labor markets broadly, along with workforce replacement and the existing and missing data collection on impacts. However, we respectfully request that local agency employers be added to the proposed advisory panel to ensure the recommendations to the Legislature reflect a more complete assessment of how AI is used in the workplace.

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Thank you for your consideration of our requested amendments. We look forward to working with you to advance this measure with an advisory body reflecting a more complete representation of voices in California's workforce stakeholders.

Sincerely,

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

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

Johnnie Piña
Legislative Advocate
League of California Cities
jpina@calcities.org

April 13, 2026

The Honorable Darshana Patel
Chair, Assembly Education Committee
1020 N Street, Room 159
Sacramento, CA 95814

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As amended April 9, 2026 – SUPPORT
To be heard in Assembly Education on April 22, 2026

Dear Chair Patel:

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), League of California Cities (Cal Cities), and California Special Districts Association (CSDA), we are pleased to support Assembly Bill 2640 (Hadwick), which we believe provides sensible fiscal relief and the fiscal flexibility necessary for efficient, modern governance by local agencies. The state mandate reimbursement process, and administrative issues therein generally, have long burdened local governments and our organizations continue to support efforts to reform the current process.

Reimbursable State Mandate Process: Long and Uncertain
Every year, the Governor signs, on average, more than 1,000 bills and enacts new laws in the interest of governing California. Many new laws require local governments to implement new programs or provide new services. Laws that require local government entities to implement new programs or provide higher levels of service to the public are often referred to as "reimbursable state mandates," a term of art particular to California.

Local governments are required to comply with all laws that create new state-mandated programs and services. When those new initiatives do not come with an appropriation of funds to carry them out, local governments only receive funding to carry out many state-mandated programs through reimbursement payments from the state long after the fact, and only when a state body has adjudicated the matter through a convoluted claims process.

Reimbursement for local governments to comply with new state-mandated programs is not automatic. Local governments initiate the process to receive reimbursement approval via the Commission on State Mandates, which may take a year or more to determine whether the new law meets the constitutional criteria for reimbursement—and even longer to establish a process and rate for reimbursement. Therefore, local governments comply with new costly laws pending reimbursement status, often funding these programs alone for years, facing the uncertainty of reimbursement. Local governments comply with all other state mandates using local revenues.

Backlog of Unreimbursed State-Mandated Costs Owed to Local Governments

Over the years, the state has accrued a significant backlog of funds owed to local governments for work performed to carry out state-mandated projects. According to the State Controller's Office[1], as of October 2025 the state owes local governments collectively $910.9 million, including estimated accrued interest. This nearly $1 billion figure includes funds owed for claims for active state-mandated programs, unpaid claims from prior fiscal years, and outstanding "incorrect reduction" claims filed with the Commission on State Mandates.

How This Measure Helps

Even after a reimbursement is issued, an audit or review by the State Controller's Office may reduce the reimbursement amount paid by disallowing previously approved payments years after the fact. When the State Controller's Office disallows costs previously claimed by counties, the affected county may choose to either remit the disallowed amount to the state, or the State Controller's Office offsets (withholds) commensurate amounts from state-mandated costs reimbursements filed by that county in subsequent fiscal years. Either way, the local government then must pay that disallowed amount back to the state. These repayments must occur even if the state has other outstanding debts owed to that local government. For some local governments, especially communities with constrained budgets, repaying even a portion of their reimbursement claims causes fiscal strain.

This measure will authorize the Controller to allow a local government to offset any reduced reimbursement from other unpaid reimbursement claims occurring on or after January 1, 2027, or request an adjustment to the payment of claims for underpayments or overpayments that occurred in previous years. This change would provide local governments with financial relief instead of allowing the state to claw back funds while still owing debts to that same local government. This mechanism supports cash-strapped local governments and retains critical funding for under-resourced communities.

Local governments continue to support efforts to modernize the state mandate claiming and reimbursement process. AB 2640 represents a modest, but important, step towards these

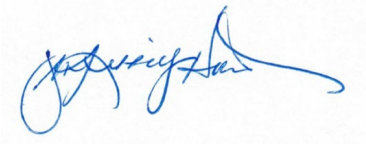
[1] State Controller's Office AB 3000 State-Mandated Program Cost Report of Payments and Appropriations (October 31, 2025)

reform efforts and provides needed fiscal flexibility for local agencies. For these reasons, we are pleased to support AB 2640. 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
ejungwirth@counties.org

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



Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
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Ben Triffo
Legislative Affairs, Lobbyist
League of California Cities
btriffo@calcities.org

Marcus Detwiler
Legislative Representative
California Special Districts Association
marcusd@csda.net

CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Assembly Education Committee
Tanya Lieberman, Chief Consultant, Assembly Education Committee
Bob Becker, Consultant, Assembly Republican Caucus

March 18, 2026

The Honorable Juan Carrillo
Chair, Assembly Local Government Committee
1020 O Street, Suite 157
Sacramento, CA 95814

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As introduced February 20, 2026 – SUPPORT
To be heard in Assembly Local Government on March 25, 2026

Dear Chair Carrillo:

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), and League of California Cities (Cal Cities), we are pleased to support Assembly Bill 2640 (Hadwick), which we believe provides sensible fiscal relief and the fiscal flexibility necessary for efficient, modern governance by local agencies. The state mandate reimbursement process, and administrative issues therein generally, have long burdened local governments and our organizations continue to support efforts to reform the current process.

Reimbursable State Mandate Process: Long and Uncertain
Every year, the Governor signs, on average, more than 1,000 bills and enacts new laws in the interest of governing California. Many new laws require local governments to implement new programs or provide new services. Laws that require local government entities to implement new programs or provide higher levels of service to the public are often referred to as "reimbursable state mandates," a term of art particular to California.

Local governments are required to comply with all laws that create new state-mandated programs and services. When those new initiatives do not come with an appropriation of funds to carry them out, local governments only receive funding to carry out many state-mandated programs through reimbursement payments from the state long after the fact, and only when a state body has adjudicated the matter through a convoluted claims process.

Reimbursement for local governments to comply with new state-mandated programs is not automatic. Local governments initiate the process to receive reimbursement approval via

the Commission on State Mandates, which may take a year or more to determine whether the new law meets the constitutional criteria for reimbursement—and even longer to establish a process and rate for reimbursement. Therefore, local governments comply with new costly laws pending reimbursement status, often funding these programs alone for years, facing the uncertainty of reimbursement. Local governments comply with all other state mandates using local revenues.

Backlog of Unreimbursed State-Mandated Costs Owed to Local Governments

Over the years, the state has accrued a significant backlog of funds owed to local governments for work performed to carry out state-mandated projects. According to the State Controller's Office[1], as of October 2025 the state owes local governments collectively $910.9 million, including estimated accrued interest. This nearly $1 billion figure includes funds owed for claims for active state-mandated programs, unpaid claims from prior fiscal years, and outstanding "incorrect reduction" claims filed with the Commission on State Mandates.

How This Measure Helps

Even after a reimbursement is issued, an audit or review by the State Controller's Office may reduce the reimbursement amount paid by disallowing previously approved payments years after the fact. When the State Controller's Office disallows costs previously claimed by counties, the affected county may choose to either remit the disallowed amount to the state, or the State Controller's Office offsets (withholds) commensurate amounts from state-mandated costs reimbursements filed by that county in subsequent fiscal years. Either way, the local government then must pay that disallowed amount back to the state. These repayments must occur even if the state has other outstanding debts owed to that local government. For some local governments, especially communities with constrained budgets, repaying even a portion of their reimbursement claims causes fiscal strain.

This measure will authorize the Controller to allow a local government to offset any reduced reimbursement from other unpaid reimbursement claims occurring on or after January 1, 2027. This change would provide local governments with financial relief instead of allowing the state to claw back funds while still owing debts to that same local government. This mechanism supports cash-strapped local governments and retains critical funding for under-resourced communities.

Local governments continue to support efforts to modernize the state mandate claiming and reimbursement process. AB 2640 represents a modest, but important, step towards these reform efforts and provides needed fiscal flexibility for local agencies. For these reasons, we are pleased to support AB 2640. Should you have any questions regarding our position, please do not hesitate to contact us.

[1] State Controller's Office AB 3000 State-Mandated Program Cost Report of Payments and Appropriations (October 31, 2025)

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties
ejungwirth@counties.org

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

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

Ben Triffo
Legislative Affairs, Lobbyist
League of California Cities
btriffo@calcities.org

CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Assembly Local Government Committee
Angela Mapp, Chief Consultant, Assembly Local Government Committee
Tobias Wolken, Consultant, Assembly Republican Caucus

April 1, 2026

The Honorable Cottie Petrie-Norris
California State Assembly
1021 O Street, Suite 8120
Sacramento, CA 95814

Re: AB 2656 (Petrie-Norris): Public Employees: notice: artificial intelligence performing service within the scope of work
As amended 3/19/26 – OPPOSE
Set for hearing 4/08/26 – Assembly Public Employment and Retirement Committee

Dear Assembly Member Petrie-Norris:

On behalf of the Urban Counties of California (UCC), the California Special Districts Association, the Rural County Representatives of California, and the California State Association of Counties, we write in respectful opposition to your Assembly Bill 2656, a measure that will require local agencies to provide a recognized employee organization no less than 45 days' written notice before taking an action to develop, purchase, implement, or utilize any generative artificial intelligence to perform a service that is within the scope of work of the job classification represented by the recognized employee organization. While this brief measure appears simple on its face, these notification requirements will burden local agency employers, preclude efficiencies, impact service delivery, and undermine productive labor relations with little benefit.

Like much of the public sector, local agencies are cautiously testing the use of artificial intelligence tools in day-to-day operations. Tools that promise to streamline routine activities (like the note-taking tools included in virtual meeting software such as Zoom and Teams) allow our employees to focus their time and attention on the most important components of serving the public. Often, these tools are relatively benign, like ChatGPT and Microsoft Copilot, and such tools are frequently included in off-the-shelf software ubiquitous in the modern office environment. When tools become available that assist with specific aspects of public service (like charting in a health clinic or monitoring drinking water safety), they are often vetted in partnership with employees with the mutual goals of ensuring staff is empowered to focus on certain aspects of their work and providing more efficient and effective outcomes that benefit the public.

Importantly, local agencies remain subject to the statutory provisions Meyers-Milias-Brown Act (MMBA), which require local agencies to meet and confer with recognized employee organizations regarding changes to employees' wages, hours, or terms and conditions of employment. Existing law provides a robust framework for determining when particular uses of generative artificial intelligence may actually have a significant and adverse effect on the employment relationship, in

which case notification (and more) is already required. This bill is therefore both overbroad and unnecessary.

Finally, local agencies are subject to last year's AB 339 (Chapter 687, Statutes of 2025), which requires additional notice to recognized employee organizations regarding a range of local agency contracting activities, even when those activities do not rise to the level of triggering meet-and-confer obligations under the MMBA's usual standards. This additional notification requirement has been incredibly burdensome for local agencies and has required a significant amount of time, legal resources, and training to implement. The further unworkable notification provisions in this bill would exacerbate these concerns and represent another state mandate for which the state may be obligated to provide reimbursement under Article XIII B of the California Constitution.

It is also important to note the myriad other legislative measures that seek to limit the use of artificial intelligence in the public sector in multiple forms. Regardless of the benefit of any new technologies and regardless of any obligation to take such action in a public meeting, local agencies would be seriously hindered in adopting such tools under these proposals. To be sure, if some of those measures are approved by the Legislature, there will be no notification necessary as many of them would effectively impose bans on the use of most AI tools.

AB 2656 appears to be a solution without a clearly identified problem. As a result, we must oppose the bill. Should you have any questions about our position, please reach out to us directly.

Sincerely,

Jean Kinney Hurst
Legislative Representative
Urban Counties of California

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Sarah Dukett
Policy Advocate
Rural County Representatives of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

cc: The Honorable Tina McKinnor, Chair, Assembly Public Employment and Retirement Committee
Members and Consultants, Assembly Public Employment and Retirement Committee

April 15, 2026

The Honorable Matt Haney
Chair, California State Assembly Committee on Housing and Community Development
1020 N Street, Room 156
Sacramento, CA 95814

RE: **Assembly Bill 2741 (Muratsuchi) Housing element: inventory of land: substantial compliance.**
Notice of SUPPORT If Amended *(As of 3/19/26)*

Dear Chair Haney,

On behalf of the League of California Cities (Cal Cities), the California State Association of Counties (CSAC), the American Planning Association California Chapter (APA), the Rural County Representatives of California (RCRC), and the Urban Counties of California (UCC), we are pleased to support if amended **AB 2741 (Muratsuchi)**. This measure would provide local governments time to correct housing element violations after a court rules that a previously certified housing element is no longer compliant with state law. Additionally, AB 2741 would allow local governments to utilize affordable housing overlay zones for mixed-use development within their housing elements, provided specific requirements are met. While we are supportive of these initial efforts, we firmly believe that a longer conversation is needed regarding the use of overlays and an extended timeline for local agencies to comply with new legal requirements before fines and other accountability measures are imposed.

In October 2025, California's Second Appellate District ruled in *New Commune DTLA LLC v City of Redondo Beach* that the City of Redondo Beach's housing element was not compliant with state law because the jurisdiction's use of residential zoning overlays could not satisfy the city's Regional Housing Needs Allocation (RHNA) obligations. Notably, these overlays were approved and guided by the California Department of Housing and Community Development (HCD), which had previously certified the city's housing element. As a result, the jurisdiction's housing element was invalidated despite state approval, exposing

the city to fines and other accountability measures, through no fault or ill will of the local government.

Throughout the 6th RHNA cycle, HCD allowed hundreds of local governments to use residential overlay zones to meet their RHNA obligations and certified their housing elements. Following the Redondo Beach decision, these jurisdictions now face elevated litigation risk and potential noncompliance with state housing law. AB 2741 would provide temporary protection for previously certified housing elements after a court ruling invalidates an approved element, allowing local agencies time to correct violations before penalties are imposed. Additionally, the bill would allow the continued use of affordable housing overlays, subject to clear standards such as minimum density requirements, development standards, housing and affordability incentives, and specific mixed-use criteria.

Zoning overlays remain an important affordable housing tool for local governments and have been a state-endorsed method for cities and counties to create thousands of additional housing units at all income levels. These overlays help support walkable, infill development near transit, jobs, and services, while promoting higher-density affordable housing. Eliminating or unduly restricting these tools would make it significantly more difficult for local governments to achieve the Legislature's priorities including transit-oriented development and balanced economic and residential growth.

Although our organizations believe the temporary protection is a positive first step, we strongly believe the compliance timeline should be extended and applied retroactively, ensuring local governments have time to navigate local processes and respond to evolving legal interpretations. Additionally, we firmly believe that overlay zones should remain a tool local agencies can use to comply with RHNA obligations and balance the need for economic development and residential growth. We remain open to ongoing dialogue and conversations on these issues and strongly encourage the legislature to act with urgency, as more local governments may face lawsuits soon.

For these reasons, Cal Cities, RCRC, CSAC, APA, and UCC are pleased to support your bill if amended. If you have additional questions, please contact Brady Guertin with Cal Cities at bguertin@calcities.org, Tracy Rhine with RCRC at trhine@rcrcnet.org, Mark Neuburger with CSAC at mneuburger@counties.org, Lauren De Valencia at Lauren@stefangeorge.com, or Chris Lee with UCC at clee@politicogroup.com.

Sincerely,

Brady Guertin
Legislative Advocate
League of California Cities

Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California

Mark Neuburger
Legislative Advocate
California State Association of Counties

Chris Lee
Legislative Advocate
Urban Counties of California

Reuben Duarte
Vice President of Policy and Legislation
APA California

February 5, 2026

The Honorable Catherine Blakespear
Member, California State Senate
1021 O Street, Suite 7720
Sacramento, CA 95814

The Honorable Thomas Umberg
Member, California State Senate
1021 O Street, Suite 6610
Sacramento, CA 95814

RE: Senate Bill 936 Support
As Introduced January 29, 2026

Dear Senators Blakespear and Umberg:

On behalf of the Rural County Representatives of California, the League of California Cities (Cal Cities), and the Urban Counties of California (UCC) we are pleased to support your SB 936, banning the sale of nitrous oxide for illicit purposes.

Senate Bill 936 bans the sale of nitrous oxide, which is widely used as an illicit recreational inhalant. The illicit use of nitrous oxide as a party drug causes serious and sobering public health and safety consequences. Proper management and disposal of large nitrous oxide cylinders is a growing and expensive waste management problem for local governments. Importantly, SB 936 preserves access to nitrous oxide for legitimate purposes by exempting sales for food preparation, manufacturing, automotive, medical, and dentistry purposes.

When used as a recreational inhalant, nitrous oxide has been linked to serious health problems, including dizziness, nausea and vomiting, memory loss, low blood pressure, impaired functioning and judgement, irregular heartbeats, severe asphyxia, and neurological damage. Nitrous oxide misuse was responsible for a fatal collision in Orange County that killed three and seriously injured four children.[1] Another nitrous oxide-related crash in Northern California killed the impaired driver, two occupants of another vehicle, and left a young mother who was a passenger in the car unable to walk or talk.[2]

California has long prohibited the use or sale of nitrous oxide for recreational purposes, but those laws have had little impact on a rapidly increasing problem. The Food and Drug Administration warned the public about the risks of recreational nitrous oxide use in June of 2025 and several cities and counties in California have since banned the sale of nitrous oxide.

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[1] https://abc7.com/post/orange-dominic-mcginley-fiery-crash-nitrous-oxide/12041765/

[2] Brooke Park, "It's Available in California Stores and Surging in Use – Yet This Dangerous Drug is Ruining Lives," *San Francisco Chronicle*, October 20, 2025.

The Honorable Catherine Blakespear
The Honorable Thomas Umberg
Senate Bill 936
February 5, 2026

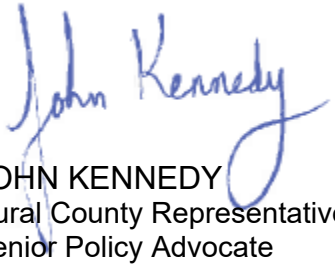
Unfortunately, existing law provides neither the tools nor the consequences to adequately address the problem. SB 936 builds upon the models adopted by local governments in Orange County, Humboldt County, Nebraska, and Louisiana and imposes serious consequences for those who illegally sell nitrous oxide.

Local agencies are responsible for the collection, processing, recycling and disposal of solid waste, including the operation of local household hazardous waste (HHW) collection programs. Waste nitrous oxide cylinders must be managed by local governments as HHW, where the cost for disposal (roughly $70-$120/container) far exceeds the initial consumer purchase price ($40-$70/container). These costs are not sustainable.

Local governments have no control over what products are introduced into the marketplace and for which we will ultimately be responsible for management and disposal. By banning the sale of large nitrous oxide containers, SB 936 will significantly reduce cost pressures and management challenges for local solid waste programs and their operators.

In short, SB 936 will better protect children and young adults from the dangers of illicit nitrous oxide use while reducing local government solid waste management costs and challenges. For these reasons, we are pleased to support your SB 936. Please do not hesitate to contact us if you have any questions.

Sincerely,



JOHN KENNEDY
Rural County Representatives of California
Senior Policy Advocate
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JOLENA VOORHIS
League of California Cities
Legislative Advocate, Public Safety
jvoorhis@calcities.org

JEAN HURST
Urban Counties of California
Legislative Advocate
jkh@hbeadvocacy.com

cc: The Honorable Juan Alanis, California State Assembly

March 2, 2026

The Honorable Aisha Wahab
Chair, Senate Business, Professions, and Economic Development Committee
1021 O Street, Suite 8530
Sacramento, CA 95814

RE: Senate Bill 936 – Support
As Introduced January 29, 2026

Dear Senator Wahab:

On behalf of the Rural County Representatives of California, the League of California Cities (Cal Cities), the Urban Counties of California (UCC), and the County of Santa Barbara we are pleased to support Senate Bill 936 (Blakespear), banning the sale of nitrous oxide for illicit purposes.

Senate Bill 936 bans the sale of nitrous oxide, which is widely used as an illicit recreational inhalant. The illicit use of nitrous oxide as a party drug causes serious and sobering public health and safety consequences. Proper management and disposal of large nitrous oxide cylinders is a growing and expensive waste management problem for local governments. Importantly, SB 936 preserves access to nitrous oxide for legitimate purposes by exempting sales for food preparation, manufacturing, automotive, medical, and dentistry purposes.

When used as a recreational inhalant, nitrous oxide has been linked to serious health problems, including dizziness, nausea and vomiting, memory loss, low blood pressure, impaired functioning and judgement, irregular heartbeats, severe asphyxia, and neurological damage. Nitrous oxide misuse was responsible for a fatal collision in Orange County that killed three and seriously injured four children.[1] Another nitrous oxide-related crash in Northern California killed the impaired driver, two occupants of another vehicle, and left a young mother who was a passenger in the car unable to walk or talk.[2]

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Unfortunately, existing law provides neither the tools nor the consequences to adequately address the problem. SB 936 builds upon the models adopted by local governments in Orange County, Humboldt County, Nebraska, and Louisiana and imposes serious consequences for those who illegally sell nitrous oxide.

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In short, SB 936 will better protect children and young adults from the dangers of illicit nitrous oxide use while reducing local government solid waste management costs and challenges. For these reasons, we are pleased to support SB 936 and respectfully request your “aye” vote when this measure is heard before your committee. Please do not hesitate to contact us if you have any questions.

Sincerely,

JOHN KENNEDY
Rural County Representatives of California
Senior Policy Advocate
jkennedy@rcrcnet.org

JOLENA VOORHIS
League of California Cities
Legislative Advocate, Public Safety
jvoorhis@calcities.org

JEAN HURST
Urban Counties of California
Legislative Advocate
jkh@hbeadvocacy.com

ELISABETH ESPINOSA
County of Santa Barbara
Legislative Advocate
ehe@hbeadvocacy.com

cc: The Honorable Catherine Blakespear, Member of the California State Senate
The Honorable Thomas Umberg, Member of the California State Senate
The Honorable Juan Alanis, Member of the California State Assembly
Members of the Senate Business, Professions, and Economic Development Committee
Sarah Mason, Staff Director, Senate Business, Professions, and Economic Development Committee
Policy Consultant, Senate Republican Caucus

April 16, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
State Capitol, Rm 412
Sacramento, CA 95814

RE: Senate Bill 936 (Blakespear) – SUPPORT
As Amended April 8, 2026

Dear Senator Cervantes:

On behalf of the Rural County Representatives of California, the League of California Cities (Cal Cities), the Urban Counties of California (UCC), and the County of Santa Barbara we are pleased to support Senate Bill 936 (Blakespear), banning the sale of nitrous oxide for illicit purposes.

Senate Bill 936 bans the sale of nitrous oxide, which is widely used as an illicit recreational inhalant. The illicit use of nitrous oxide as a party drug causes serious and sobering public health and safety consequences. Proper management and disposal of large nitrous oxide cylinders is a growing and expensive waste management problem for local governments. Importantly, SB 936 preserves access to nitrous oxide for legitimate purposes by exempting sales for food preparation, manufacturing, automotive, medical, veterinary, and dentistry purposes.

When used as a recreational inhalant, nitrous oxide has been linked to serious health problems, including dizziness, nausea and vomiting, memory loss, low blood pressure, impaired functioning and judgement, irregular heartbeats, severe asphyxia, and neurological damage. Nitrous oxide misuse was responsible for a fatal collision in Orange County that killed three and seriously injured four children.[1] Another nitrous oxide-related crash in Northern California killed the impaired driver, two occupants of another vehicle, and left a young mother who was a passenger in the car unable to walk or talk.[2]

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Food and Drug Administration warned the public about the risks of recreational nitrous oxide use in June of 2025 and several cities and counties in California have since banned the sale of nitrous oxide.

Unfortunately, existing law provides neither the tools nor the consequences to adequately address the problem. SB 936 builds upon the models adopted by local governments in Orange County, Humboldt County, Nebraska, and Louisiana and imposes serious consequences for those who illegally sell nitrous oxide.

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In short, SB 936 will better protect children and young adults from the dangers of illicit nitrous oxide use while reducing local government solid waste management costs and challenges. For these reasons, we are pleased to support SB 936 and respectfully request your “aye” vote when this measure is heard before your committee. Please do not hesitate to contact us if you have any questions.

Sincerely,

JOHN KENNEDY
Rural County Representatives of California
Senior Policy Advocate
jkennedy@rcrcnet.org

JOLENA VOORHIS
League of California Cities
Legislative Advocate, Public Safety
jvoorhis@calcities.org

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Urban Counties of California
Legislative Advocate
jkh@hbeadvocacy.com

ELISABETH ESPINOSA
County of Santa Barbara
Legislative Advocate
ehe@hbeadvocacy.com

cc: The Honorable Catherine Blakespear, Member of the California State Senate
The Honorable Thomas Umberg, Member of the California State Senate
Members of the Senate Appropriations Committee
Bob Franzoia, Policy Consultant, Senate Office of Research
Eric Csizmar, Policy Consultant, Senate Republican Caucus

March 2, 2026

The Honorable Jesse Arreguín
Chair, Senate Public Safety Committee
1021 O Street, Suite 6710
Sacramento, CA 95814

RE: Senate Bill 936 – Support
As Introduced January 29, 2026

Dear Senator Arreguín:

On behalf of the Rural County Representatives of California, the League of California Cities (Cal Cities), the Urban Counties of California (UCC), and the County of Santa Barbara we are pleased to support SB 936 (Blakespear), banning the sale of nitrous oxide for illicit purposes.

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jkennedy@rcrcnet.org

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cc: The Honorable Catherine Blakespear, Member of the California State Senate
The Honorable Thomas Umberg, Member of the California State Senate
The Honorable Juan Alanis, Member of the California State Assembly
Members of the Senate Public Safety Committee
Stephanie Jordan, Chief Counsel, Senate Public Safety Committee
Eric Csizmar, Policy Consultant, Senate Republican Caucus

March 25, 2026

The Honorable Jerry McNerney
California State Senate
1021 O Street, Suite 6640
Sacramento, CA 95814

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Introduced February 2, 2026)*

Dear Senator McNerney:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, Association of California Healthcare Districts, League of California Cities, Association of California School Administrators, and California Association of School Business Officials, write in respectful opposition to Senate Bill (SB) 947, which would complicate the routine work of local governments and educational agencies, while increasing expenses, without a clear need.

Prior Legislation and Prior Veto
SB 947 is a successor to last year's SB 7 (McNerney), which was vetoed by Governor Newsom. In the Governor's Veto Message, he stated:

> *However, rather than address specific way employers misuse this technology, the bill imposes unfocused notification requirements on any business using even the most innocuous tools. The proposed solution fails to directly address incidents of misuse.*

Indeed, local governments have not been provided with specific examples of their misuse of these technologies.

We acknowledge that SB 947 does not contain pre-use notification requirements as SB 7 did. However, SB 947 takes important and costly steps backwards from the enrolled version of SB 7, directly implicating the concerns raised by the Governor. Specifically, SB 7's human review and post-use notification requirements applied when an employer **"primarily relied"** on the ADS to **"make"** a discipline, termination, or deactivation decision. SB 947 expands these requirements to when an employer merely **"uses"** an ADS to **"assist"** in making such decisions, thus significantly increasing the scope and scale of covered employer actions. Further, SB 7 required a human reviewer to review the ADS output, and compile and review other information that is relevant to the decision, if any. In contrast, SB 947 requires the employer to direct a human reviewer to conduct an **"independent investigation"** and compile

corroborating and supporting information. Corroboration is now required for any use of an ADS output to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. The combination of increasing the scope of the bill, and increasing the burdens of compliance, will deter local governments from using these important emerging technologies and increase their litigation risk.

SB 947 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 are significant.

SB 947 is an Unfunded Mandate on State and Local Budgets
The initial and ongoing obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. Some small agencies and departments may struggle to comply with the bill's requirements. The bill requires the employer to provide, on request, a copy of the most recent 12 months of the worker's own data primarily used by an ADS to make a discipline, termination, or deactivation decision, once per year, together with detailed information and requirements to protect third parties. Complying with, and potentially analyzing, these voluminous data requests will divert public resources from core responsibilities.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For public employers with represented workforces, collective bargaining agreements already provide mechanisms for appealing personnel decisions. This bill's enforcement provisions overlay appeal rights for public employees that could create confusion, workload redundancy, and legal uncertainty. The bill also defines an "employer" subject to its provisions to also include all branches of state government (see Proposed Labor Code Section 1520(d)(1)). With the state and local agencies grappling with a substantial and growing decline in support from the federal government for a variety of programs and services, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Applying SB 947 to Public Employers May Lead to Unintended Consequences
Local governments and educational agencies are responsible for essential services including operating and securing critical infrastructure, jails, hospitals, police and fire departments, and of course public education. They may use an ADS to support and enhance these functions but SB 947 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, could trigger the bill's significant requirements if the ADS output is used to make a discipline, termination, or deactivation decision – a line which may not always be clear, but which is critical due to resulting notification and human review requirements. 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 requirements, 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.

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.

Collective Bargaining Agreement Exception Does Not Resolve Our Concerns
Rather than resolving concerns, the bill's Collective Bargaining Agreement (CBA) exemption creates new problems by requiring that agreements waive the provisions of the bill and provide 'protections from algorithmic management' to qualify. As an example, in health care settings, this could be misinterpreted to place essential systems and tools—needed for core operations—into collective bargaining negotiations, potentially making their use incompatible with their intended purpose and undermining public health care delivery. Further, either complying with the statutory requirements of this bill, or agreeing to a CBA that addresses the same issue in this bill, would effectively narrow or remove the issue from bargaining.

Put simply, for public employers, the burdens potentially imposed by this bill far exceed the benefits and purported need.

For these reasons, our organizations must respectfully oppose SB 947. 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
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Healthcare Districts
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Dorothy Johnson
Legislative Advocate
Association of California School
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Johnnie Piña
League of California Cities
Legislative Affairs, Lobbyist
jpina@calcities.org

Mishaal Gill
Director of Policy and Advocacy California
Association of School Business Officials
mgill@casbo.org

March 25, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Introduced February 2, 2026)*

Dear Chair Smallwood-Cuevas:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, Association of California Healthcare Districts, League of California Cities, Association of California School Administrators, and California Association of School Business Officials, write in respectful opposition to Senate Bill (SB) 947, which would complicate the routine work of local governments and educational agencies, while increasing expenses, without a clear need.

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Rather than resolving concerns, the bill's Collective Bargaining Agreement (CBA) exemption creates new problems by requiring that agreements waive the provisions of the bill and provide 'protections from algorithmic management' to qualify. As an example, in health care settings, this could be misinterpreted to place essential systems and tools—needed for core operations—into collective bargaining negotiations, potentially making their use incompatible with their intended purpose and undermining public health care delivery. Further, either complying with the statutory requirements of this bill, or agreeing to a CBA that addresses the same issue in this bill, would effectively narrow or remove the issue from bargaining.

Put simply, for public employers, the burdens potentially imposed by this bill far exceed the benefits and purported need.

For these reasons, our organizations must respectfully oppose SB 947. Please feel free to contact us at any time with questions or to further discuss our position.

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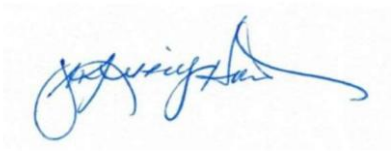

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CC:

The Honorable Jerry McNerney
Honorable Members, Senate Labor, Public Employment and Retirement Committee
Alma Perez, Chief Consultant, Senate Labor, Public Employment and Retirement Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

April 10, 2026

The Honorable Christopher Cabaldon
Chair, Senate Privacy, Digital Technologies, and
Consumer Protection Committee
California State Senate
1020 N Street, Room 568
Sacramento, CA 95814

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended March 26, 2026)*

Dear Chair Cabaldon:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, Association of California Healthcare Districts, League of California Cities, Association of California School Administrators, California Association of School Business Officials, and Public Risk Innovation, Solutions, and Management, write in respectful opposition to Senate Bill (SB) 947, which would complicate the routine work of local governments and educational agencies, while increasing expenses, without a clear need.

Prior Legislation and Prior Veto
SB 947 is a successor to last year's SB 7 (McNerney), which was vetoed by Governor Newsom. In the Governor's Veto Message, he stated:

> *However, rather than address specific way employers misuse this technology, the bill imposes unfocused notification requirements on any business using even the most innocuous tools. The proposed solution fails to directly address incidents of misuse.*

Indeed, local governments have not been provided with specific examples of their misuse of these technologies.

We acknowledge that SB 947 does not contain pre-use notification requirements as SB 7 did. However, SB 947 takes important and costly steps backwards from the enrolled version of SB 7, directly implicating the concerns raised by the Governor. Specifically, SB 7's human review and post-use notification requirements applied when an employer **"primarily relied"** on the ADS to **"make"** a discipline,

termination, or deactivation decision. SB 947 expands these requirements to when an employer merely **"uses"** an ADS to **"assist"** in making such decisions, thus significantly increasing the scope and scale of covered employer actions. Further, SB 7 required a human reviewer to review the ADS output, and compile and review other information that is relevant to the decision, if any. In contrast, SB 947 requires the employer to direct a human reviewer to conduct an **"independent investigation"** and compile corroborating and supporting information. Corroboration is now required for any use of an ADS output to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. The combination of increasing the scope of the bill, and increasing the burdens of compliance, will deter local governments from using these important emerging technologies and increase their litigation risk.

SB 947 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 are significant.

SB 947 is an Unfunded Mandate on State and Local Budgets
The initial and ongoing obligations required by this bill will burden local human resources and information technology departments, increasing costs and diverting them from their core responsibilities. Some small agencies and departments may struggle to comply with the bill's requirements. The bill requires the employer to provide, on request, a copy of the most recent 12 months of the worker's own data primarily used by an ADS to make a discipline, termination, or deactivation decision, once per year, together with detailed information and requirements to protect third parties. Complying with, and potentially analyzing, these voluminous data requests will divert public resources from core responsibilities.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For public employers with represented workforces, collective bargaining agreements already provide mechanisms for appealing personnel decisions. This bill's enforcement provisions overlay appeal rights for public employees that could create confusion, workload redundancy, and legal uncertainty. The bill also defines an "employer" subject to its provisions to also include all branches of state government (see Proposed Labor Code Section 1520(d)(1)). With the state and local agencies grappling with a substantial and growing decline in support from the federal government for a variety of programs and services, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Applying SB 947 to Public Employers May Lead to Unintended Consequences
Local governments and educational agencies are responsible for essential services including operating and securing critical infrastructure, jails, hospitals, police and fire departments, and of course public education. They may use an ADS to support and enhance these functions but SB 947 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, could trigger the bill's significant requirements if the ADS output is used to make a discipline, termination, or deactivation decision – a line which may not always be clear, but which is critical due to resulting notification and human review requirements. 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 requirements, 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.

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.

Collective Bargaining Agreement Exception Does Not Resolve Our Concerns
Rather than resolving concerns, the bill's Collective Bargaining Agreement (CBA) exemption creates new problems by requiring that agreements waive the provisions of the bill and provide 'protections from algorithmic management' to qualify. As an example, in health care settings, this could be misinterpreted to place essential systems and tools—needed for core operations—into collective bargaining negotiations, potentially making their use incompatible with their intended purpose and undermining public health care delivery. Further, either complying with the statutory requirements of this bill, or agreeing to a CBA that addresses the same issue in this bill, would effectively narrow or remove the issue from bargaining.

Put simply, for public employers, the burdens potentially imposed by this bill far exceed the benefits and purported need.

For these reasons, our organizations must respectfully oppose SB 947. Please feel free to contact us at any time with questions or to further discuss our position.

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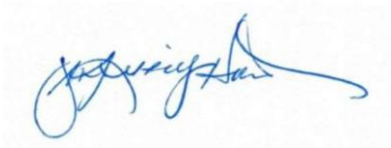

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CC:

The Honorable Jerry McNerney
Honorable Members, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Scott Seekatz, Policy Consultant, Senate Republican Caucus

March 27, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended March 26, 2026)*

Dear Chair Smallwood-Cuevas:

The California Special Districts Association, California State Association of Counties, Urban Counties of California, Rural County Representatives of California, Association of California Healthcare Districts, League of California Cities, Association of California School Administrators, and California Association of School Business Officials, write in respectful opposition to Senate Bill (SB) 947, which would complicate the routine work of local governments and educational agencies, while increasing expenses, without a clear need.

Prior Legislation and Prior Veto
SB 947 is a successor to last year's SB 7 (McNerney), which was vetoed by Governor Newsom. In the Governor's Veto Message, he stated:

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compile and review other information that is relevant to the decision, if any. In contrast, SB 947 requires the employer to direct a human reviewer to conduct an **"independent investigation"** and compile corroborating and supporting information. Corroboration is now required for any use of an ADS output to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. The combination of increasing the scope of the bill, and increasing the burdens of compliance, will deter local governments from using these important emerging technologies and increase their litigation risk.

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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.

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For these reasons, our organizations must respectfully oppose SB 947. Please feel free to contact us at any time with questions or to further discuss our position.

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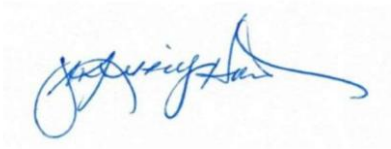

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The Honorable Jerry McNerney
Honorable Members, Senate Labor, Public Employment and Retirement Committee
Alma Perez, Chief Consultant, Senate Labor, Public Employment and Retirement Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

March 27, 2026

The Honorable Eloise Gomez Reyes
California State Senate
1021 O Street, Room 7210
Sacramento, CA 95814

Re: Senate Bill 951 (Reyes). Employment: technological displacement: notice.
Oppose Unless Amended (*as amended March 26, 2026*)

Dear Senator Reyes,

On behalf of the undersigned statewide organizations representing local educational and local government agencies we write to express our "oppose unless amended" position to your Senate Bill 951, related to workforce displacement or termination due to the adoption of certain technologies. Regrettably, this conflicts with well-established layoff notice and rehire statutory requirements in the education sector, as well as technology bargaining between other local government employers and employees. As such, we request that the bill be amended to exempt local educational agency (LEA) employers and local government employers from the bill's new requirements.

In summary, SB 951 would establish the California Worker Technological Displacement Act, and require employers to provide at least a 90-day advanced written notice before any reduction in hours or termination caused wholly or primarily due to the use of artificial intelligence or other automated technology (undefined). For employers of 100 or more, it establishes return rights for terminated employees and prohibition of termination during the 90-day notice period. Compliance failure causes an employer to be liable for backpay and any medical expenses incurred by the worker that would have been covered by an employer-sponsored health plan. The bill would also subject public agencies to a $500 fine for each day of a violation and allows any interested party to file a report of compliance failure with the Labor Commissioner. It should be noted that independent contractors are included in the definition of "worker" so under SB 951, cities, counties, school districts and special districts would have to provide employees of a private company backpay and other benefits if proper notice is not given.

(continued)

Regrettably, SB 951 creates processes that are likely better suited for private labor practices and does not fit schools serving TK- 12 grade levels or local government employers. First, for school employers, SB 951 would create a bifurcated system of layoff notice procedures outside the well-established March 15 layoff notice process that applies to both certificated and classified positions.

Further, the rehire procedures in SB 951 could bump other school employees from their return-to-work rehiring rights by undermining both existing collectively bargained agreements and statewide practices conforming with California Education Code statutes. Under existing law, LEAs have established rehire policies that provide 39 months of return rights to the same classification, without losing seniority, for individuals who have been laid off (due to budget constraints or reduced levels in service needs) or have exhausted their medical leave. This practice includes job opportunities notifications for positions they are qualified for, or may be qualified[1] for, and the opportunities are offered based on seniority. Seniority is also used to determine job offers when there is more than one qualified candidate. Job notifications are provided to individuals on the rehire list based on the format determined by a collectively bargained agreement.

In addition, for public employers with represented workforces, including cities, counties, special districts, and school districts, the 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 to deter or discourage union membership. Specifically, Government Code Section 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 Section 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.

In closing, SB 951 mandates costly administrative procedures for implementing and tracking in addition to liability exposure for complaints brought by any member of the public for possible violations. Further, this measure unfortunately interrupts practices already in place for public school employees who are laid off for reasons outside of job performance or disciplinary proceedings, and their rights to return to work.

For these reasons, we respectfully request that paragraphs (2) and (3) of subdivision (b) are removed from the definition of "employer" in Section 1414.1 of the bill. Thank you for your consideration and please do not hesitate to contact Dorothy Johnson, Association of

[1] *Tucker v. Grossmont Union High School District (2008)*

(continued)

California School Administrators Legislative Advocate, if you have any questions regarding our position at (916) 329-3807.

Sincerely,

Dorothy Johnson
Legislative Advocate
Association of California School Administrators

Aaron Avery
Director of State Legislative Affairs
California Special Districts Association

Sarah Dukett
Policy Advocate
Rural County Representatives of California

Jean Hurst
Legislative Representative
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

March 27, 2026

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

Re: Senate Bill 951 (Reyes). Employment: technological displacement: notice.
Oppose Unless Amended (*as amended March 26, 2026*)

Dear Senator Smallwood-Cuevas,

On behalf of the undersigned statewide organizations representing local educational and local government agencies we write to express our "oppose unless amended" position to Senate Bill 951 (Reyes), related to workforce displacement or termination due to the adoption of certain technologies. Regrettably, this conflicts with well-established layoff notice and rehire statutory requirements in the education sector, as well as technology bargaining between other local government employers and employees. As such, we request that the bill be amended to exempt local educational agency (LEA) employers and local government employers from the bill's new requirements.

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(continued)

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In addition, for public employers with represented workforces, including cities, counties, special districts, and school districts, the 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 to deter or discourage union membership. Specifically, Government Code Section 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 Section 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.

In closing, SB 951 mandates costly administrative procedures for implementing and tracking in addition to liability exposure for complaints brought by any member of the public for possible violations. Further, this measure unfortunately interrupts practices already in place for public school employees who are laid off for reasons outside of job performance or disciplinary proceedings, and their rights to return to work.

For these reasons, we respectfully request that paragraphs (2) and (3) of subdivision (b) are removed from the definition of “employer” in Section 1414.1 of the bill. Please do not

[1] *Tucker v. Grossmont Union High School District (2008)*

(continued)

hesitate to contact Dorothy Johnson, Association of California School Administrators Legislative Advocate, if you have any questions regarding our position at (916) 329-3807.

Sincerely,

Dorothy Johnson
Legislative Advocate
Association of California School Administrators

Aaron Avery
Director of State Legislative Affairs
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Sarah Dukett
Policy Advocate
Rural County Representatives of California

Jean Hurst
Legislative Representative
Urban Counties of California

Eric Lawyer
Legislative Advocate
California State Association of Counties

Cc: Honorable Members, Senate Labor, Public Employment and Retirement Committee
The Honorable Eloise Gomez Reyes, State Senator
Alma Perez, Staff Director, Senate Labor, Public Employment and Retirement Committee
Jesse Herzer, Consultant, Senate Republican Caucus
Scott Seekatz, Consultant, Senate Republican Caucus

April 13, 2026

The Honorable Christopher Cabaldon
Chair, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
1020 N Street, Room 568
Sacramento, CA 95814

RE: Senate Bill 951 (Reyes) – OPPOSE UNLESS AMENDED
As Amended April 9, 2026

Dear Senator Cabaldon:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), California Special Districts Association (CSDA), Urban Counties of California (UCC), the League of California Cities (Cal Cities) and Association of California Healthcare Districts (ACHD) we must regretfully oppose Senate Bill 951 (Reyes) unless amended, regarding workforce displacement or termination due to the adoption of certain technologies, unless amended to exempt local government employers.

SB 951 would establish California Worker Technological Displacement Act, and require employers to provide at least a 90-day advanced written notice before any reduction in hours or termination caused in whole or substantial part by the use of artificial intelligence (AI) or other automated technology (undefined). For employers of 100 or more, it establishes return rights for terminated employees and prohibition of termination during the 90-day notice period. Compliance failure causes an employer to be liable for back pay and any medical expenses incurred by the worker that would have been covered by an employer-sponsored health plan. The bill would also subject public agencies to a $500 fine for each day of a violation and allows any interested or uninterested party to file a report of compliance failure with the Labor Commissioner. It should be noted that independent contractors are included in the definition of “worker” so under SB 951, cities,

counties, and special districts would have to provide employees of a private company backpay and other benefits if proper notice is not given.

Importantly, local agencies remain subject to the statutory provisions of the Meyers-Milias-Brown Act (MMBA), which require local agencies to meet and confer with recognized employee organizations regarding changes to employees' wages, hours, or terms and conditions of employment. In those cases, existing law provides a robust framework for determining when particular uses of generative artificial intelligence may actually have a significant and adverse effect on the employment relationship, in which case notification (and more) is already required.

In addition, for public employers with represented workforces, including cities, counties, and special districts, the 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 to deter or discourage union membership. Specifically, Government Code Section 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 Section 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.

Finally, the requirement that certain employers (including many public entities) must provide displaced workers "the right of first bid on other positions with the employer" will immediately conflict with the provisions of negotiated memorandums of understanding (and merit-based civil service systems), which prescribe in detail the process for filling vacant positions. These provisions, including seniority consideration, bumping rights, and examination requirements, have been carefully developed by employers and employee organizations through collective bargaining, which would be undermined by SB 951. For federal grant-in-aid positions, new laws that conflict with merit-based civil service may jeopardize federal funding for social services.

In short, SB 951 creates processes that are likely better suited for private labor practices and does not fit local government employers. This bill would, mandate costly administrative procedures for implementation, and creates liability exposure for complaints brought by any member of the public for possible violations.

For these reasons, RCRC, CSAC, CSDA, ACHD, Cal Cities, and UCC must oppose SB 951 unless amended as described above. If you should have any questions, please do not hesitate to contact us.

Sincerely,

SARAH DUKETT
Rural County Representatives of California
Senior Policy Advocate
sdukett@rcrcnet.org

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

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Legislative Representative
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AARON AVERY
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League of California Cities
jpina@calcities.org

cc: The Honorable Eloise Gomez Reyes, Member of the California State Assembly
Members, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Christian Kurpiewski, Chief Consultant, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Morgan Branch, Policy Consultant, Senate Republican Caucus

March 12, 2026

The Honorable Maria Elena Durazo
Chair, Senate Local Government Committee
State Capitol, Rm 407
Sacramento, CA 95814

RE: Senate Bill 1005 – Support
As Introduced February 9, 2026

Dear Senator Durazo:

On behalf of the Rural County Representatives of California, the California Association of County Treasurers and Tax Collectors (CACTTC), the League of California Cities (Cal Cities), the California State Association of Counties (CSAC), and the California Special Districts Association (CSDA), we are pleased to support Senate Bill 1005 (Caballero), the PENNIES Act, which provides much needed clarity to public agencies following the end of penny production by the federal government.

Following federal action to discontinue penny production, local agencies require statutory authority to manage the resulting operational impacts from eliminating the coin from the currency stream. On February 9, 2025, President Trump ordered the Treasury Secretary, Scott Bessent, to stop producing new pennies at the U.S. Mint. The last penny produced for general circulation was minted at the U.S. Mint in Philadelphia on November 12, 2025. The US Treasury states the decision was influenced by the rising cost of producing the penny, which has increased from 1.42 cents to 3.69 cents per penny.

Beginning in October 2025, local agency treasurers were notified by their commercial banks that, once existing penny supplies are exhausted, banks will no longer be able to fulfill penny orders for public agency clients. As a result, local agencies will be unable to consistently provide exact change to taxpayers and residents who prefer to make their payments to government agencies in cash.

Current statute does not account for the elimination of the penny and does not authorize public agencies to round cash payments to the nearest five cents. SB 1005 provides this critical relief to local agencies that must accept cash payments. This measure does not change any payment options available to those making their payments to public agencies; it simply reflects a new reality in how local agencies will conduct cash payments due to changes at the Federal level. This is a vital piece of public policy that will be urgently needed as the availability of the US Penny rapidly diminishes in the coming months.

For these reasons, we are pleased to support SB 1005 and respectfully request your "aye" vote when this measure is heard before your committee. Please do not hesitate to contact us if you have any questions.

Sincerely,

SARAH DUKETT
Rural County Representatives of California
Senior Policy Advocate
sdukett@rcrcnet.org

KAREN LANGE
California Association of County Treasurers
and Tax Collectors
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California State Association of Counties
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AARON AVERY
California Special Districts Association
Director of State Legislative Affairs
aarona@csda.net

BEN TRIFFO
League of California Cities
Legislative Advocate
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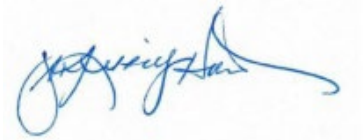

JEAN HURST
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

cc: The Honorable Anna Caballero, Member of the California State Senate
Members, Senate Local Government Committee
Jonathan Peterson, Principal Consultant, Senate Local Government Committee
Ryan Eisberg, Policy Consultant, Senate Republican Caucus

April 15, 2026

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

RE: Senate Bill 1016 (Blakespear) – Community Assistance, Recovery and Empowerment Act (CARE) Court – OPPOSE

Dear Chair Umberg,

On behalf of the County Behavioral Health Directors Association (CBHDA), the California State Association of Counties (CSAC), the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), **we write to share our opposition to Senate Bill 1016 (Blakespear), as amended on March 26, 2026.**

Background on WIC 5200

Welfare and Institution Code Section 5200 allows any individual to allege that another individual is a danger to themselves or others or gravely disabled as a result of their mental health condition, and to request a court-ordered county mental health evaluation of that person under the Lanterman-Petris-Short (LPS) Act. This has existed in California law since the inception of the LPS Act in 1967.

Proponents of the bill have argued that this bill is needed to compel counties to use this section, as counties rarely use this authority.

This authority has historically not been used because ***counties have more efficient and effective ways to evaluate an individual who is a danger to themselves or others or potentially gravely disabled.*** Namely, counties have stood up a statewide network of 24/7 community-based mobile crisis teams to help immediately respond and deescalate behavioral health crisis and connect individuals to services. Where an individual is considered a danger to themselves or others or gravely disabled, counties typically rely on LPS WIC Section 5150 to immediately detain and evaluate individuals who are at risk. In either scenario, if a person is found to meet the criteria for an LPS Conservatorship, a county is able to immediately assess and connect individuals to the public guardian for investigation, without having to go through a lengthy court process.

Concerns with SB 1016

- **Exclusion of CARE Act diagnoses:** This bill would update the law related to these unique petitions for evaluation by first, excluding individuals who have the diagnoses covered under CARE Act from eligibility for a petition under WIC 5200. While this change appears to be intended to encourage more CARE Act petitions, it may have the unintended consequence of arbitrarily restricting the public's options under WIC 5200 today, and again result in further unnecessary delays as interested parties may need to wait for the CARE petition process to play out.
- **Introduces an involuntary detention into the CARE Act process, thereby changing the voluntary nature of the CARE Act.** This bill expands authority of the court to involuntarily detain an individual subject to a petition under the CARE Act to an involuntary detention for the purposes of conducting an evaluation to determine whether there is probable cause that the individual is a danger to themselves, others, or gravely disabled. Because this assessment is not necessary to qualify an individual for CARE, it is concerning that the court could extend these orders to CARE Act respondents, and it would fundamentally alter the voluntary nature of CARE.
- **Creates a pathway for CARE Act petitioners to be granted a court-ordered involuntary evaluation based on their belief that the individual may be too impaired to be willing or able to participate in the CARE process, if the petition was dismissed by the court.** Counties are concerned with the lack of due process for the respondent, as well as the lack of clinical judgement necessary to trigger this involuntary detention for the purpose of an evaluation. This ability is extended to the perception on the part of the petitioner who lacks sufficient evidence under existing CARE Act statutes that the respondent may be at risk of becoming a danger to themselves or others or gravely disabled. Taken together, these changes would open the ability for petitioners to request involuntary detention and evaluations for individuals for whom there is no imminent or proven risk to themselves or others, thereby undermining the legislative intent of the LPS Act.

In summary, Californians may request an evaluation under WIC Section 5200 today, however, it adds an additional, unnecessary step to connect those most at risk with the array of services available to them through CARE, LPS, and community-based mobile crisis services. By tying together the involuntary, court-ordered evaluation process to CARE, the result of this bill will be to compel the very same involuntary detention options available to counties under WIC Section 5150 today as a consequence for individuals who, for myriad reasons, may be unwilling to participate voluntarily in the CARE process. In addition, because WIC Section 5200 is open to petitions from any person, this bill would significantly expand the number of individuals for whom counties would need to pursue involuntary evaluations, without the evidence that such a detention is warranted upfront.

For these reasons above, **we are opposed to SB 1016 and respectfully request your "No" vote.** For questions, please feel free to contact our respective organizations below.

Sincerely,

Amer W. Rashid
Director of Legislative Affairs
CBHDA
arashid@cbhda.org

Brendan McCarthy
Senior Legislative Advocate
CSAC
bmccarthy@counties.org

Kelly Brooks-Lindsey
Legislative Advocate
UCC
kbl@hbeadvocacy.com

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org

CC: Honorable Senator Catherine Blakespear
Honorable Members of the Senate Judiciary Committee
Allison Whitt Meredith, Counsel, Senate Judiciary Committee
Stephanie Welch, Deputy Secretary, Health and Human Services Agency

March 17, 2026

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

RE: Senate Bill 1159 (Cabaldon) – SUPPORT
As Introduced February 18, 2026

Dear Chair Umberg:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counites (CSAC), Urban Counties of California (UCC), and the League of California Cities (Cal Cities) we are pleased to support Senate Bill 1159 (Cabaldon), which would put important safeguards in place to protect the ability of the public to comment on matters before local agencies in an age of quickly evolving Artificial Intelligence (AI) technology.

California's open meeting and open governance laws are intended to not only allow the public to observe deliberations about issues that will affect their communities, but to participate as well. Local agencies accept public comment on matters both on the agenda and off. Technology has been a powerful tool to make public participation more accessible than ever, as agendas and the time and location of public meetings are posted online. Those unable to comment or observe in person are able to follow along online or submit written comments via email or web portal.

However, emerging AI and Large Language Model (LLM) tools have now made it easier than ever for bad actors to misrepresent public opinion in governance decisions. According to reporting from multiple outlets, in June 2025 a political consultant used AI tools to generate twenty thousand emails to the South Coast Air Quality Management District regarding a regulatory proposal before the board.[1] The AI generated emails purported to be from members of the public in South Coast AQMD's jurisdiction, but during an audit by air district staffers many said that they were not aware of signing onto any such messages. In an interview with a trade publication, the political consultant behind the advocacy effort bragged about how the volume "left the South Coast AQMD staff reeling."

Automated engagement tools have the capacity to overwhelm government agencies, crowd out the voices of actual members of the public, and undermine the intent of California's

[1] An AI-powered campaign may have killed a key vote on air quality - Los Angeles Times
When the cloud comes for public comments - POLITICO
Residents deny sending emails pushing Bay Area air policy change – SF Chronicle

transparent governance laws. Clarifying how these laws apply in the context of emerging technologies, particularly distinguishing between authentic public input and activity generated at scale by artificial intelligence systems, represents an important step toward protecting meaningful public participation, open governance, and critical staff resources for local agencies. With thoughtful refinement, SB 1159 will help address these challenges in a way that is both effective and implementable as technology continues to evolve quickly.

We appreciate the author's attention to this emerging challenge and the importance of safeguarding meaningful public participation in local governance. As this proposal moves forward, we look forward to working collaboratively with the author and stakeholders to develop amendments that ensure the bill's intent is both clear and effective, while remaining workable and practical for local agencies to implement.

For these reasons, RCRC, UCC, CSAC, and Cal Cities are pleased to support SB 1159. If you should have any questions, please do not hesitate to contact us.

Sincerely,

SARAH DUKETT
Senior Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

ERIC LAWYER
Senior Legislative Advocate
California State Association of Counties
elawyer@counties.org

JOHNNIE PIÑA
Legislative Advocate
League of California Cities
jpina@calcities.org

JEAN HURST
Legislative Representative
Urban Counties of California
jkh@hbeadvocacy.com

cc: The Honorable Chrisopher Cabaldon, Member, California State Senate
Members, Senate Judiciary Committee
Members, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Margie Estrada, Chief Counsel, Senate Judiciary Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

April 2, 2026

The Honorable Christopher Cabaldon
Chair, Senate Privacy, Digital Technologies, and Consumer Protection Committee
1020 N Street, Room 568
Sacramento, CA 95814

RE: Senate Bill 1159 (Cabaldon) – SUPPORT
As Amended March 25, 2026

Dear Chair Cabaldon:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counites (CSAC), Urban Counties of California (UCC), California Municipal Clerks Association (CMCA), and the League of California Cities (Cal Cities) we are pleased to support Senate Bill 1159, which would put important safeguards in place to protect the ability of the public to comment on matters before local agencies in an age of quickly evolving Artificial Intelligence (AI) technology.

California's open meeting and open governance laws are intended to not only allow the public to observe deliberations about issues that will affect their communities, but to participate as well. Local agencies accept public comment on matters both on the agenda and off. Technology has been a powerful tool to make public participation more accessible than ever, as agendas and the time and location of public meetings are posted online. Those unable to comment or observe in person are able to follow along online or submit written comments via email or web portal.

However, emerging AI and Large Language Model (LLM) tools have now made it easier than ever for bad actors to misrepresent public opinion in governance decisions. According to reporting from multiple outlets, in June 2025 a political consultant used AI tools to generate twenty thousand emails to the South Coast Air Quality Management District regarding a regulatory proposal before the board.[1] The AI generated emails purported to be from members of the public in South Coast AQMD's jurisdiction, but during an audit by air district staffers many said that they were not aware of signing onto any such messages. In an interview with a trade publication, the political consultant behind the advocacy effort bragged about how the volume "left the South Coast AQMD staff reeling."

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[1] An AI-powered campaign may have killed a key vote on air quality - Los Angeles Times
When the cloud comes for public comments - POLITICO
Residents deny sending emails pushing Bay Area air policy change – SF Chronicle

Automated engagement tools have the capacity to overwhelm government agencies, crowd out the voices of actual members of the public, and undermine the intent of California's transparent governance laws. Clarifying how these laws apply in the context of emerging technologies, particularly distinguishing between authentic public input and activity generated at scale by artificial intelligence systems, represents an important step toward protecting meaningful public participation, open governance, and critical staff resources for local agencies. With thoughtful refinement, SB 1159 will help address these challenges in a way that is both effective and implementable as technology continues to evolve quickly.

We appreciate the author's attention to this emerging challenge and the importance of safeguarding meaningful public participation in local governance. As this proposal moves forward, we look forward to working collaboratively with the author and stakeholders to develop amendments that ensure the bill's intent is both clear and effective, while remaining workable and practical for local agencies to implement.

For these reasons, RCRC, UCC, CSAC, CMCA, and Cal Cities are pleased to support SB 1159. Please do not hesitate to contact us if you have any questions.

Sincerely,

SARAH DUKETT
Senior Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org

ERIC LAWYER
Senior Legislative Advocate
California State Association of Counties
elawyer@counties.org

JOHNNIE PIÑA
Legislative Advocate
League of California Cities
jpina@calcities.org

JEAN HURST
Legislative Representative
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ETHAN NAGLER
Legislative Representative
California Municipal Clerks Association
enagler@publicpolicygroup.com

cc: Members, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Christian Kurpiewski, Chief Consultant, Senate Privacy, Digital Technologies, and Consumer Protection Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

April 16, 2026

The Honorable Maria Elena Durazo
California State Senate
1021 O Street, Suite 7530
Sacramento, CA 95814

RE: SB 1319 (Durazo) California Public Records Act: public investment funds.
As Amended April 15, 2026

Dear Senator Durazo,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC) must respectfully oppose your Senate Bill 1319 because it could substantially limit investment options for CalPERS, CalSTRS, and county retirement systems and ultimately raise annual contributions costs for both employers, including special districts and counties, and their employees.

SB 1319 would amend existing law to require pension systems to disclose information about private equity investments, including portfolio positions of their investments and the name(s), amount of commitments, and cash contributions made by all investors in a general partnership. The bill would also require pension systems to disclose the value of assets and the basis for continued operation of investments that remain active beyond the originally stated term.

While we believe in strong standards for public pension system transparency, we are concerned this change will put California pension systems at a competitive disadvantage compared to other institutional investors.

As of the end of the 2024-25 fiscal year, public pension systems in California managed well over $1 trillion in total assets. These funds are needed to pay retirement benefits to California's public employees: teachers, principals, firefighters, law enforcement, sanitation

workers, and front-line service providers upholding the social safety net, to name just a few examples of our public workforce. While public employees and employers both contribute significantly to these pension assets, the majority of a pension fund's assets are made through investment returns.

Private equity has often been among the top performing asset classes for California's pension funds and has outperformed public equity investments. In recent years, California's pension funds have begun to outperform their peers, with CalPERS earning the highest three-year time-weighted return among peers and CalSTRS earning the sixth highest[1].

By compelling pension systems to publish portfolio positions, SB 1319 could constrain opportunities for California pension fund investments in the most coveted general partnerships. This could have direct impacts on public agencies and the public workforce. Lost, or reduced, investment returns increase pension system costs. Those costs must be paid through higher contribution rates: directly impacting public agency budgets and the paychecks of public employees. We also have serious concerns regarding possible legal actions that could be taken by limited partners in these investments, as the bill could subject them to new disclosure rules well after the formation of legal agreements made among investors.

California's public workforce deserves the retirement benefits they have been promised. Bills that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers.

Sincerely,

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

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

[1] The CalPERS Private Equity Turnaround (January 2026)

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

April 16, 2026

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

RE: SB 1319 (Durazo) California Public Records Act: public investment funds.
As Amended April 15, 2026
To be heard in the Senate Committee on Labor, Public Employment and Retirement April 22, 2026

Dear Chair Smallwood-Cuevas,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC) must respectfully oppose Senate Bill 1319 (Durazo) because it could substantially limit investment options for CalPERS, CalSTRS, and county retirement systems and ultimately raise annual contributions costs for both employers, including special districts and counties, and their employees.

SB 1319 would amend existing law to require pension systems to disclose information about private equity investments, including portfolio positions of their investments and the name(s), amount of commitments, and cash contributions made by all investors in a general partnership. The bill would also require pension systems to disclose the value of assets and the basis for continued operation of investments that remain active beyond the originally stated term.

While we believe in strong standards for public pension system transparency, we are concerned this change will put California pension systems at a competitive disadvantage compared to other institutional investors.

As of the end of the 2024-25 fiscal year, public pension systems in California managed well over $1 trillion in total assets. These funds are needed to pay retirement benefits to California's public employees: teachers, principals, firefighters, law enforcement, sanitation workers, and front-line service providers upholding the social safety net, to name just a few examples of our public workforce. While public employees and employers both contribute significantly to these pension assets, the majority of a pension fund's assets are made through investment returns.

Private equity has often been among the top performing asset classes for California's pension funds and has outperformed public equity investments. In recent years, California's pension funds have begun to outperform their peers, with CalPERS earning the highest three-year time-weighted return among peers and CalSTRS earning the sixth highest1.

By compelling pension systems to publish portfolio positions, SB 1319 could constrain opportunities for California pension fund investments in the most coveted general partnerships. This could have direct impacts on public agencies and the public workforce. Lost, or reduced, investment returns increase pension system costs. Those costs must be paid through higher contribution rates: directly impacting public agency budgets and the paychecks of public employees. We also have serious concerns regarding possible legal actions that could be taken by limited partners in these investments, as the bill could subject them to new disclosure rules well after the formation of legal agreements made among investors.

California's public workforce deserves the retirement benefits they have been promised. Bills that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers.

Sincerely,

[1] The CalPERS Private Equity Turnaround (January 2026)

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

Jean Hurst
Legislative Representative
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Sarah Dukett
Senior Policy Advocate
Rural County Representatives of
California
sdukett@rcrcnet.org

CC: The Honorable Maria Elena Durazo
Members, Senate Committee on Labor, Public Employment and Retirement
Glenn Miles, Principal Consultant, Senate Committee on Labor, Public Employment and Retirement
Jesse Herzer, Policy Consultant, Senate Republican Caucus

URBAN COUNTIES
OF CALIFORNIA

2026 UCC Leadership

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

March 31, 2026

The Honorable Akilah Weber Pierson, MD
Chair, Senate Health Committee
1021 O Street, Room 7310
Sacramento, California 94814

Re: SB 1422 (Durazo) – Covered California Expansion
As Introduced – SUPPORT
Set for Hearing April 8, 2026 in Senate Health Committee

Dear Senator Weber Pierson:

On behalf of the Urban Counties of California (UCC), I write in support of SB 1422, which would end the enrollment freeze on Medi-Cal for undocumented Californians ages 19 and older and restore full-scope coverage beginning January 1, 2027.

The 2025-26 State Budget froze Medi-Cal enrollment for undocumented adults, leaving otherwise-eligible Californians without access to routine and preventive care. When people lose coverage, they still seek care – often through emergency rooms or local safety-net providers. Without regular coverage, individuals often delay treatment until conditions worsen. Restoring access to Medi-Cal allows earlier treatment and preventive services, improving health outcomes and reducing expensive emergency care. Health care allows Californians to access the right care, at the right time, and in the right setting. Access to affordable coverage is essential to improving health in our communities.

SB 1422 will restore California's progress made toward achieving universal health care and maintain California's commitment to health equity.

For these reasons, UCC supports SB 1422. Please do not hesitate to contact me for additional information at 916-753-0844 or kbl@hbeadvocacy.com.

Sincerely,

Kelly Brooks-Lindsey
Legislative Advocate

cc: Maria Elena Durazo, Member, California State Senate
Members and Consultants, Senate Health Committee

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URBANCOUNTIES.COM

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April 3, 2026

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

The Honorable Dawn Addis
Chair, Assembly Budget Subcommittee No. 1
1021 O Street, Room 4120
Sacramento, CA 95814

Re: Request for State Investment to Restore and Sustain County Indigent Care Programs

Dear Assembly Member Gabriel and Assembly Member Addis,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), County Medical Services Program (CMSP), California Association of Public Hospitals and Health Systems (CAPH), and County Health Executives Association of California (CHEAC) write to request state investment so that counties can expand and restart indigent care services as California's health care safety net provider of last resort.

The budget request related to indigent care services is part of the comprehensive budget request from counties for funding to implement H.R. 1, which can be found at https://www.counties.org/hr1/.

Historical Context and the State–County Partnership

Understanding counties' indigent care responsibilities requires recognizing the complex funding relationship between the state and counties.

In 1978, Proposition 13 fundamentally altered the state–local fiscal relationship by sharply reducing county property tax revenues. In 1982, the state transferred responsibility for the medically indigent adult program to counties and provided state funding to support that obligation.

In 1991, facing additional state budget pressures, California enacted realignment, shifting fiscal and programmatic responsibility for specified health, public health, mental health, and social services programs to counties, along with ongoing funding—primarily from a half cent sales tax and vehicle license fee revenues. These revenues flow into separate subaccounts: health, social services, and mental health. The health subaccount historically funded both county indigent care and county public health activities.

Indigent Care

Counties provide basic subsistence medical care, often time limited and intended as a care of last resort, as part of the indigent care mandate. State law gives counties discretion to set standards of aid and care, including eligibility requirements, covered services, and duration of participation.

Counties are not obligated to provide services to undocumented individuals, and behavioral health services are not part of the indigent care mandate. Eligibility requirements, benefit levels, and cost sharing vary widely by county.

Counties operated indigent care programs through three distinct models:

- **County Medical Services Program (CMSP):** 35 rural and semi-rural counties jointly contract with clinics and hospitals.
- **Article 13 Counties:** 11 counties that do not participate in CMSP or provide indigent care directly, through contracted providers, or hybrid models.
- **Provider Counties:** 12 counties rely primarily on their public hospital and health care systems.

ACA, AB 85, and the Erosion of Indigent Care Support

The Affordable Care Act (ACA) dramatically expanded access to health coverage through Medi-Cal and Covered California, allowing millions of Californians to gain coverage – many of whom were the childless adults that counties served through their indigent programs.

However, with this expansion, the state enacted AB 85 (Chapter 24, Statutes of 2013), which substantially altered health realignment funding. AB 85 slowed the rate of growth of health realignment revenues and redirected significant portions of those funds annually to offset state General Fund costs for CalWORKs grants.

Under AB 85:

- Non-CMSP counties were required to redirect either a flat 60 percent of health realignment revenues annually, or a formula-based share tied to revenues and costs post the ACA expansion and compared to historical realignment amounts spent on indigent care.
- CMSP collectively contributed 60 percent of board revenues annually, in addition to a portion of the redirected share from CMSP counties. Note, in 2019, the state passed SB 1371 (2019), which resulted in CMSP no longer receiving any realignment revenues.

As a result, what remains in the health subaccount for counties primarily supports public health and limited indigent care eligibility beyond Medi-Cal. As fewer individuals relied on indigent care, much of the program infrastructure—clinical capacity, staffing, administrative systems, and information technology—was diminished or eliminated.

Renewed Demand and the Impact of H.R. 1

Looking ahead, counties now face renewed and significant pressure to revive and/or expand county indigent care programs. H.R. 1 and upcoming Medi-Cal community engagement requirements, beginning in January 2027, are expected to drive a substantial increase in the uninsured population. Individuals subject to these requirements will begin losing coverage at their annual—and then semiannual—redetermination dates, with counties anticipating an initial surge in demand during the final quarter of the 2026-27 fiscal year.

To develop a responsible and realistic funding request, counties made conservative assumptions:

- Only individuals projected by the Department of Health Care Services to lose Medi-Cal due to community engagement requirements, and who have a legal immigration status, were included.
- Counties assumed only one-third of that population will seek and qualify for indigent care, reflecting state and county efforts to keep people in coverage and assist with Medi-Cal reenrollment.

Because indigent care programs were scaled down after the ACA, counties must now rebuild infrastructure to meet increased demand. For the 23 non-CMSP counties, this includes investments in clinical delivery systems, information technology, fiscal and legal infrastructure, workforce capacity, and administrative operations. Counties may also look to build processes to establish documentation to support medical frailty and disability determinations, which can exempt eligible individuals from community engagement requirements and allow a return to full scope Medi-Cal coverage.

Counties do not have the resources to undertake this rebuilding effort without sustained, dedicated state funding.

Requested State Investment for Indigent Care

To protect California's health care safety net and uphold the longstanding state–county partnership, counties respectfully request the following multiyear investment for indigent care:

- $761 million in 2026-27
    - $200 million for infrastructure rebuilding, to be used over three years.
    - $511 million for direct indigent care services, including administrative costs.
    - $50 million for increased public health costs.
- $2.4 billion in 2027-28 and ongoing to support indigent care medical services across all 58 counties, including $50 million to support public health.

For decades, counties have served as California's health care safety net of last resort, adapting to shifting policy, funding, and coverage landscapes. The convergence of diminished realignment support, infrastructure erosion, and impending coverage losses now places that safety net at risk.

We urge the Legislature to reinvest in county indigent care programs – the last resort safety net for health care services – and ensure counties have the tools and resources necessary to meet their statutory obligations, protect public health, and protect other critical county services, including public safety.

Thank you for your leadership and partnership. We look forward to working with you to secure a stable and sustainable future for California's county health care safety net.

Sincerely,

Brendan McCarthy, Senior Legislative Advocate
California State Association of Counties (CSAC)

Kelly Brooks-Lindsey, Legislative Advocate
Urban Counties of California (UCC)

Sarah Dukett, Policy Advocate
Rural County Representatives of California (RCRC)

Katie Rodriguez, Interim President & CEO
California Association of Public Hospitals and Health Systems (CAPH)

Kari Brownstein, Executive Director
County Medical Services Program (CMSP)

Michelle Gibbons, Executive Director
County Health Executives Association of California (CHEAC)

cc: Honorable Members, Assembly Budget Committee
Joe Stephenshaw, Director, California Department of Finance
Kim Johnson, Secretary, California Health and Human Services Agency
Erica Pan, Director and State Public Health Officer, California Department of Public Health
Michelle Baass, Director, California Department of Health Care Services
Richard Figueroa, Office of Governor Gavin Newsom

Paula Villescaz, Office of Governor Gavin Newsom
Rosielyn Pulmano, Office of the Assembly Speaker Robert Rivas
Christian Griffith, Assembly Budget Committee
Patrick Le, Assembly Budget Committee
Joe Shinstock, Assembly Republican Caucus
Eric Dietz, Assembly Republican Caucus

April 3, 2026

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

The Honorable Dawn Addis
Chair, Assembly Budget Subcommittee No. 1
1021 O Street, Room 4120
Sacramento, CA 95814

Re: Request for State Investment to Restore and Sustain County Indigent Care Programs

Dear Assembly Member Gabriel and Assembly Member Addis,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), County Medical Services Program (CMSP), California Association of Public Hospitals and Health Systems (CAPH), and County Health Executives Association of California (CHEAC) write to request state investment so that counties can expand and restart indigent care services as California's health care safety net provider of last resort.

The budget request related to indigent care services is part of the comprehensive budget request from counties for funding to implement H.R. 1, which can be found at https://www.counties.org/hr1/.

Historical Context and the State–County Partnership

Understanding counties' indigent care responsibilities requires recognizing the complex funding relationship between the state and counties.

In 1978, Proposition 13 fundamentally altered the state–local fiscal relationship by sharply reducing county property tax revenues. In 1982, the state transferred responsibility for the medically indigent adult program to counties and provided state funding to support that obligation.

In 1991, facing additional state budget pressures, California enacted realignment, shifting fiscal and programmatic responsibility for specified health, public health, mental health, and social services programs to counties, along with ongoing funding—primarily from a half cent sales tax and vehicle license fee revenues. These revenues flow into separate subaccounts: health, social services, and mental health. The health subaccount historically funded both county indigent care and county public health activities.

Indigent Care

Counties provide basic subsistence medical care, often time limited and intended as a care of last resort, as part of the indigent care mandate. State law gives counties discretion to set standards of aid and care, including eligibility requirements, covered services, and duration of participation.

Counties are not obligated to provide services to undocumented individuals, and behavioral health services are not part of the indigent care mandate. Eligibility requirements, benefit levels, and cost sharing vary widely by county.

Counties operated indigent care programs through three distinct models:

- **County Medical Services Program (CMSP):** 35 rural and semi-rural counties jointly contract with clinics and hospitals.
- **Article 13 Counties:** 11 counties that do not participate in CMSP or provide indigent care directly, through contracted providers, or hybrid models.
- **Provider Counties:** 12 counties rely primarily on their public hospital and health care systems.

ACA, AB 85, and the Erosion of Indigent Care Support

The Affordable Care Act (ACA) dramatically expanded access to health coverage through Medi-Cal and Covered California, allowing millions of Californians to gain coverage – many of whom were the childless adults that counties served through their indigent programs.

However, with this expansion, the state enacted AB 85 (Chapter 24, Statutes of 2013), which substantially altered health realignment funding. AB 85 slowed the rate of growth of health realignment revenues and redirected significant portions of those funds annually to offset state General Fund costs for CalWORKs grants.

Under AB 85:

- Non-CMSP counties were required to redirect either a flat 60 percent of health realignment revenues annually, or a formula-based share tied to revenues and costs post the ACA expansion and compared to historical realignment amounts spent on indigent care.
- CMSP collectively contributed 60 percent of board revenues annually, in addition to a portion of the redirected share from CMSP counties. Note, in 2019, the state passed SB 1371 (2019), which resulted in CMSP no longer receiving any realignment revenues.

As a result, what remains in the health subaccount for counties primarily supports public health and limited indigent care eligibility beyond Medi-Cal. As fewer individuals relied on indigent care, much of the program infrastructure—clinical capacity, staffing, administrative systems, and information technology—was diminished or eliminated.

Renewed Demand and the Impact of H.R. 1

Looking ahead, counties now face renewed and significant pressure to revive and/or expand county indigent care programs. H.R. 1 and upcoming Medi-Cal community engagement requirements, beginning in January 2027, are expected to drive a substantial increase in the uninsured population. Individuals subject to these requirements will begin losing coverage at their annual—and then semiannual—redetermination dates, with counties anticipating an initial surge in demand during the final quarter of the 2026-27 fiscal year.

To develop a responsible and realistic funding request, counties made conservative assumptions:

- Only individuals projected by the Department of Health Care Services to lose Medi-Cal due to community engagement requirements, and who have a legal immigration status, were included.
- Counties assumed only one-third of that population will seek and qualify for indigent care, reflecting state and county efforts to keep people in coverage and assist with Medi-Cal reenrollment.

Because indigent care programs were scaled down after the ACA, counties must now rebuild infrastructure to meet increased demand. For the 23 non-CMSP counties, this includes investments in clinical delivery systems, information technology, fiscal and legal infrastructure, workforce capacity, and administrative operations. Counties may also look to build processes to establish documentation to support medical frailty and disability determinations, which can exempt eligible individuals from community engagement requirements and allow a return to full scope Medi-Cal coverage.

Counties do not have the resources to undertake this rebuilding effort without sustained, dedicated state funding.

Requested State Investment for Indigent Care

To protect California's health care safety net and uphold the longstanding state–county partnership, counties respectfully request the following multiyear investment for indigent care:

- $761 million in 2026-27
    - $200 million for infrastructure rebuilding, to be used over three years.
    - $511 million for direct indigent care services, including administrative costs.
    - $50 million for increased public health costs.
- $2.4 billion in 2027-28 and ongoing to support indigent care medical services across all 58 counties, including $50 million to support public health.

For decades, counties have served as California's health care safety net of last resort, adapting to shifting policy, funding, and coverage landscapes. The convergence of diminished realignment support, infrastructure erosion, and impending coverage losses now places that safety net at risk.

We urge the Legislature to reinvest in county indigent care programs – the last resort safety net for health care services – and ensure counties have the tools and resources necessary to meet their statutory obligations, protect public health, and protect other critical county services, including public safety.

Thank you for your leadership and partnership. We look forward to working with you to secure a stable and sustainable future for California's county health care safety net.

Sincerely,

Brendan McCarthy, Senior Legislative Advocate
California State Association of Counties (CSAC)

Kelly Brooks-Lindsey, Legislative Advocate
Urban Counties of California (UCC)

Sarah Dukett, Policy Advocate
Rural County Representatives of California (RCRC)

Katie Rodriguez, Interim President & CEO
California Association of Public Hospitals and Health Systems (CAPH)

Kari Brownstein, Executive Director
County Medical Services Program (CMSP)

Michelle Gibbons, Executive Director
County Health Executives Association of California (CHEAC)

cc: Honorable Members, Assembly Budget Committee
Joe Stephenshaw, Director, California Department of Finance
Kim Johnson, Secretary, California Health and Human Services Agency
Erica Pan, Director and State Public Health Officer, California Department of Public Health
Michelle Baass, Director, California Department of Health Care Services
Richard Figueroa, Office of Governor Gavin Newsom

Paula Villescaz, Office of Governor Gavin Newsom
Rosielyn Pulmano, Office of the Assembly Speaker Robert Rivas
Christian Griffith, Assembly Budget Committee
Patrick Le, Assembly Budget Committee
Joe Shinstock, Assembly Republican Caucus
Eric Dietz, Assembly Republican Caucus

March 20, 2026

The Honorable Dr. Corey Jackson
Chair, Assembly Budget Subcommittee No. 2
1021 O Street, Room 6120
Sacramento, CA 95814

The Honorable Caroline Menjivar
Chair, Senate Budget & Fiscal Review Subcommittee No. 3
1021 O Street, Room 6630
Sacramento, CA 95814

RE: In-Home Supportive Services Budget Issues

Dear Chair Jackson and Chair Menjivar:

On behalf of the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write to provide comments on several In-Home Supportive Services budget issues.

Elimination of the State's Share of Cost Growth for In-Home Supportive Services (IHSS) Hours – OPPOSE
The Governor proposes to eliminate the state's share of cost growth for In-Home Supportive Services (IHSS) hours and shift $233.6 million in costs to counties. Urban and rural counties oppose the proposal for several reasons:

1. **Increased Financial Strain on Counties**: Counties are already underfunded for IHSS administration, with extreme caseloads (400–600 clients per social worker in some counties) leading to delays in reassessments, staff turnover, and reduced access to care. Shifting costs to counties would exacerbate these issues and further strain their ability to meet growing demand for services.

2. **Mischaracterization of Cost Drivers**: The state claims that stable functional index (FI) scores suggest counties are inaccurately assessing service needs. However, counties use state-mandated tools for assessments, and the California Department of Social Services (CDSS) oversees these processes through a rigorous quality assurance program. The state itself has acknowledged that increased IHSS hours are driven by demographic shifts, aging populations, and rising needs – ***not*** county errors.

3. **Impact on Social Safety Net Programs**: IHSS is funded through 1991 Realignment revenues, which also support other critical programs like foster care, CalWORKs, CalFresh, behavioral health, and public health. The proposed cost shift would consume an even larger share of these limited funds, leaving less for other essential services and potentially forcing counties to cut programs or rely on other funding sources.

4. **Destabilization of IHSS and Caregiver Workforce**: The cost shift would create incentives for counties to reduce service hours, potentially leading to dangerous service gaps for vulnerable populations. It could also hinder counties' ability to negotiate competitive wages and benefits for IHSS providers, further weakening the caregiving workforce at a time of rising demand.

5. **Demographic Realities Ignored**: The proposal fails to account for the predictable increase in IHSS hours due to California's aging population, the growing number of individuals with cognitive impairments, and the rise in cases requiring protective supervision. These demographic trends are driving the growth in service hours, not errors in county assessments.

6. **Violation of Existing Agreements**: The proposal contradicts the 2019 IHSS Maintenance-of-Effort (MOE) agreement, which was designed to ensure county IHSS expenses remain within the limits of available social services Realignment funding. The cost shift undermines this framework and places unsustainable fiscal pressure on counties.

7. **Potential Negative Outcomes**: The proposal could lead to increased hospitalization and institutionalization of older adults and people with disabilities, disrupt trusted care relationships, and create payment lapses for IHSS providers, ultimately destabilizing the home and community-based services system.

Community First Choice Option (CFCO) Penalties – Maintain Current Penalty Structure

We are also concerned about the escalating penalties for late Community First Choice Option (CFCO) IHSS reassessments. Under federal CFCO rules, California must maintain full compliance with timely reassessments of IHSS cases to retain an enhanced federal Medicaid match. If the state falls out of compliance, it forfeits that enhanced funding and incurs financial penalties. Historically, the state absorbed these penalties, but recent policy changes require counties to pay half beginning July 1, 2025, and under current law the full cost beginning July 1, 2026. This shift is problematic; UCC and RCRC urge the Legislature to maintain the existing 50/50 state-county cost sharing rather than shifting the entire financial burden to counties.

Rather than improving timeliness, these penalties force counties to reprioritize already limited staff, which has slowed the processing of new IHSS applications and delayed reassessments for clients whose needs have changed. As a result, backlogs are growing and applicants are waiting longer for services. This cycle of penalties and resource diversion undermines the very outcomes the policy seeks to achieve and puts counties at risk of further state-mandated improvement plans and penalties.

Eliminate IHSS Residual Program – Oppose
Finally, we are concerned about the proposal to automatically terminate IHSS Residual Program services when Medi-Cal lapses. Under current practice, when a person's Medi-Cal eligibility is discontinued, the individual can temporarily remain in the IHSS residual category so that payments to their caregiver may continue while the county works with the recipient to restore Medi-Cal eligibility. This process helps maintain continuity of care and prevents disruptions for vulnerable individuals who rely on in-home assistance for basic daily needs.

Many of these lapses are caused by paperwork delays or administrative issues rather than true benefit ineligibility. These terminations will result in abrupt service interruptions for many who remain eligible. This not only increases the risk of hospitalization or institutionalization for our most vulnerable residents but also adds to county workload as staff must process an increased number of new applications, reinstatements, as well as additional service gap documentation.

Please do not hesitate to reach out with any questions.

Sincerely,

Kelly Brooks-Lindsey
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Policy Advocate
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cc: Members and Consultants, Assembly Budget Subcommittee No. 2
Members and Consultants, Senate Budget & Fiscal Review Subcommittee No. 3

URBAN COUNTIES
OF CALIFORNIA

2026 UCC Leadership

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

March 18, 2026

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

The Honorable John Laird
Chair, Senate Budget & Fiscal Review Committee
1021 O Street, Room 8720
Sacramento, CA 95814

Re: H.R. 1 Budget Investments: Medi-Cal & CalFresh Eligibility; County Indigent Care; Public Hospitals; Behavioral Health

Dear Chairs Gabriel and Laird:

On behalf of the Urban Counties of California (UCC), a coalition of the state's 14 most populous counties, I write to respectfully urge the Legislature to provide funding to counties to assist with addressing H.R. 1-related impacts. The damage wrought by H.R. 1 is not only significant for vulnerable populations but has the potential to dramatically undermine the fiscal stability of California's urban counties.

This request was developed in collaboration with our sister county associations, including the California State Association of Counties (CSAC), the Rural County Representatives of California (RCRC), and the statewide associations representing county health and human services agency leaders. Together, we seek the state's assistance in addressing the devastating impacts to the vulnerable populations we collectively serve.

H.R. 1 represents a fundamental restructuring of the federal-state-county partnership for provision of safety-net services, with consequences that urban counties cannot absorb without significant policy and fiscal mitigation. Increased uninsured rates, reduced federal support, and major new eligibility requirements for Medi-Cal and CalFresh place counties at the epicenter of implementation with limited capacity to address impacts on our own.

Urban counties request state investment in four areas to mitigate the most devastating harms H.R. 1 will impose on low-income individuals and families accessing health care and food:

1) Indigent care investments to ensure that the sickest, low-income adults who lose health care coverage still have a safety net.
2) Public hospital investments to ensure those remaining on Medi-Cal can access care at public hospitals and clinics.

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3) Eligibility investments to help ensure there is trained and sufficient workforce to timely and accurately enroll people in Medi-Cal and CalFresh.
4) Behavioral health investments to address the loss of federal funds for those requiring behavioral health services who Medi-Cal lose coverage.

These investments form a foundation to support low-income Californians and bolster the safety net as we navigate this uncertain time.

Indigent Care Investments

California law requires counties to provide basic health services[1] to indigent adults. The Newsom Administration estimates that nearly 2 million Californians will lose health coverage, including 1.4 million Medi-Cal enrollees. Additionally, the H.R. 1 changes to state-based health marketplaces will drive an estimated 660,000 Californians out of the individual market. As the number of uninsured individuals rises, the demand for county indigent care is projected to increase significantly, with an estimated 417,000 to 1.3 million individuals expected to seek services as they lose Medi-Cal coverage under H.R. 1. Unlike Medi-Cal coverage, county indigent programs are not uniform – covered services and eligibility vary from county to county.

Urban counties have historically delivered indigent care services in two ways: (1) through an affiliated county hospital and clinic system or (2) through contracted providers or a hybrid model that included contracts and county-owned clinics. UCC member counties that own and operate a county hospital and health system include: Alameda[2], Contra Costa, Los Angeles, Riverside, San Bernardino, San Francisco, San Joaquin, San Mateo, Santa Clara, Ventura. The UCC member counties that delivered indigent services through contracted or other arrangements include Fresno, Orange, Sacramento, and San Diego; these counties have significantly reduced their service delivery infrastructure since ACA implementation.

For decades, the state provided funding to counties via 1991 Realignment for indigent care because of state mandate concerns. In 2013, as part of the ACA implementation, 1991 Health Realignment revenues were redirected from local health programs and the growth associated with those funds was significantly slowed to pay for other state services. Consequently, counties do not have the resources to serve individuals who will be seeking health services from indigent programs post-H.R. 1 implementation. Counties anticipate indigent care impacts as early as spring of 2027 as the H.R. 1 Medi-Cal work requirements and semi-annual eligibility redeterminations begin impacting people's coverage.

Counties estimate the statewide cost to provide services to indigent adult population at between $2 billion and $5.5 billion, depending on how many individuals seek services. Additionally, counties must rebuild or expand indigent care programs that were scaled back after the ACA, which requires new investments in staffing, provider capacity, and infrastructure.

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[1] Welfare and Institutions Code 17000, enacted in 1965, established the legal obligation for counties to provide basic, medically necessary care to medically indigent, lawful residents. County indigent programs are not comprehensive insurance or health coverage programs, like Medi-Cal or commercial health insurance.
[2] The Alameda Health System (AHS) Hospital Authority is an independent public agency established by the Alameda County Board of Supervisors to manage, administer, and control the county's public health care system.

> **To ensure that individuals who lose their coverage and fall into the health care safety net are able to access basic health care services, UCC requests at least $700 million in 2026-27, roughly $2.3 billion in 2027-28, and additional – likely increased – support in future years as indigent health care service demands adjust.**

In addition to the indigent care impacts, as more Californians lose Medi-Cal coverage, local health departments increasingly will become the default provider for essential services – such as vaccinations, sexually transmitted infection screening, testing, and treatment – while also absorbing greater demands for communicable disease prevention, response activities, and other core public health functions. To protect community health and ensure continued access to these critical services, we request $92.2 million to support California's local health departments so they can meet rising demand and preserve the public health workforce and infrastructure.

Public Hospital Investments

Urban counties play a key role in the delivery of health care services in their communities – owning and operating hospitals and clinics.

Public hospital systems – which include county hospitals – estimate $3.4 billion in total annual losses from H.R. 1 when fully implemented. Of particular concern, H.R. 1 caps and reduces State Directed Payments (SDPs) that currently compensate for inadequate Medi-Cal base rates, resulting in $2.3 billion in cumulative losses. Additionally, H.R. 1 requires a number of eligibility and enrollment changes that will have devastating impacts to coverage. The new work and community engagement requirements on their own will cause an estimated 1.4 million Californians to lose Medi-Cal coverage, resulting in an $800 million annual loss in Medi-Cal revenue for public hospital systems.

Loss of coverage will increase utilization of uncompensated care and increase the reliance on emergency departments for routine care. It will also increase the number of sicker patients who were unable to get care earlier in their illness. Due to the uncertainty of sustained funding, emergency departments, labor and delivery units, burn and other critical service lines are at risk of closure and/or decreased access. As accessibility to these services declines, there will be a ripple effect on neighboring hospitals/services as patients seek care where it is available. UCC members with county hospitals have direct experience with increased utilization at county hospitals when other hospitals in the region close or reduce services.

Without investment from the State, California's public hospital systems will be unable to sustain current care levels. The consequences will include reduced access to services, increased wait times, staff layoffs, and possibly even facility closures.

> **In line with the request outlined by the California Association of Hospital and Health Systems (CAPH), UCC supports $500 million General Fund in 2026-27 and $850 million in 2027-28 for public hospitals to help stabilize their funding.**

Public hospitals are the only hospitals in the state that receive no State General Fund support for inpatient fee-for-service Medi-Cal. In 2005, the State withdrew its funding for the Medi-Cal match, or Non-Federal Share (NFS) for inpatient fee-for-service patients – a direct and ongoing savings to

the General Fund that now totals more than $500 million annually. Every year since then, public hospital systems have had to assume those costs, resulting in a significant loss for each service.

This challenge has been further compounded by low Medi-Cal base rates, which resulted in public hospital systems needing to secure billions of federal dollars in "supplemental" payments to help cover their costs. As with the Medi-Cal fee-for-service payments, public hospital systems provided the federal match for their supplemental payments – no General Fund was involved.

Unfortunately, H.R. 1 capped those supplemental payments – the SDPs – and reduced the Medicaid matching rate. Combined with other state budget decisions, other likely federal cuts, and already existing deficits, these losses could reach nearly $6 billion annually when H.R. 1 is fully implemented.

Consequently, public hospital systems have exhausted their federal options that might be available to cover their costs. Public hospitals need a reinvestment from the state of $500 million annually to ensure they can continue providing critical care to those most marginalized across our state.

Eligibility Investments

First, counties need resources to train and staff the eligibility workforce so that eligible Californians receive the CalFresh and Medi-Cal services they need.

- **Medi-Cal.** H.R. 1 creates two primary barriers for existing Affordable Care Act (ACA) expansion adults that threaten Medi-Cal access and ongoing coverage for millions of otherwise eligible Californians, while creating significant workload for county eligibility staff. These barriers are: (1) the introduction of community engagement and work requirements, and (2) shifting from 12-month to 6-month recertification periods. For new Medi-Cal applications, an additional procedural hurdle has been established for applicants and workers alike: applicants must demonstrate compliance with work and community engagement rules a month prior to enrollment.

  The Department of Health Care Services (DHCS) estimates that 4.6 million ACA expansion adults are currently enrolled in Medi-Cal, 2.8 million of whom cannot be automatically renewed nor exempted and for whom intensive county eligibility workforce engagement and support will be required in order to retain coverage. Within this population, DHCS projects a 50% disenrollment rate due to challenges with compliance or paperwork barriers. Under that scenario, 1.4 million enrollees – 3.5% of the state's population – would lose Medi-Cal coverage. DHCS has reported that disenrollment could be as high as 77% based on the experience of other states.

  Reducing the disenrollment rate among this vulnerable population hinges on adequate funding and training of the county eligibility workforce. Eligibility workers can properly screen, identify, and certify key exemptions not discoverable through any other means than direct interviews with enrollees to determine who may be exempt from new requirements. Further, eligibility workers support existing enrollees through compliance for individuals who do not qualify for exemptions. Additionally, workers help new applicants navigate the additional hurdle of demonstrating compliance one month before enrollment.

> **Consistent with the request made by the County Welfare Directors Association (CWDA), UCC supports $230 million General Fund in 2026-27 and $305 million General Fund in 2027-28, to provide counties with the necessary funding for the eligibility workforce to support Medi-Cal beneficiaries and mitigate the harm of these H.R. 1 policies.**

- **CalFresh.** H.R. 1 expands work requirements, eliminates eligibility for many immigrant groups, amends the Thrifty Food Plan, eliminates CalFresh Healthy Living (SNAP-Ed), and shifts substantial new administrative and benefit costs to the state and counties. Nearly 954,800 Californians could lose CalFresh, and county administrative costs are estimated to rise by more than $160 million annually in urban counties alone. Higher food insecurity will have cascading effects on family stability, health outcomes, homelessness risk, and child welfare involvement.

  Beginning June 1, 2026, at least 1 in 5 CalFresh recipients are at risk of losing life-saving food assistance due to onerous new work requirements imposed by H.R. 1, which requires proof of 20 hours per week of work, job training, education, or community service. When combined with the Able-Bodied Adult without Dependents (ABAWD) time limit policy, these rules will restrict at least 954,800 CalFresh recipients to only three months of food assistance within a 36-month period unless they are able to comply or qualify for an exemption. The Department of Social Services (CDSS) estimates that 70% of CalFresh recipients who meet the definition of an ABAWD and who are not automatically exempt or verified compliant run the greatest risk of losing benefits. However, this estimate does not include the potential impact of county eligibility workers in reducing discontinuances.

  One-on-one conversations that facilitate trust and rapport between workers and clients will help surface critical information about life circumstances and conditions that limit an individual's ability to work, ensuring a greater number of individuals who qualify for an exemption such as "unfit for work" are not inappropriately subject to work requirements and can retain access to food assistance. However, the Administration's proposed 2026-27 budget currently provides no new resources for workers to partake in retention-focused client-by-client conversations.

> **Along with our colleagues at CWDA, UCC supports augmenting CalFresh funding by $9.3 million General Fund in 2025-26; $102.8 million General Fund in 2026-27; and $57.9 million General Fund in 2027-28 and annually thereafter to address the workload impacts outlined above.**

Behavioral Health Investments

The eligibility, enrollment and financing changes in H.R. 1 will affect county behavioral health plans and delivery systems. As fewer individuals can qualify for and maintain Medi-Cal coverage, counties will see an increase in demand for uncompensated safety net services. First, as individuals with less severe behavioral health conditions lose Medi-Cal eligibility and coverage, this loss of coverage will result in diminished access to upstream behavioral health care for those who may have mild to moderate conditions. The loss of coverage also may lead to exacerbation of mental health and substance use disorder conditions, eventually resulting in the need for specialty services for some of these individuals.

County behavioral health systems are the safety net for uninsured or underinsured Californians with behavioral health needs to the extent resources are available under 1991 Realignment. Despite exemptions for work requirements, thousands of existing clients of county behavioral health will lose coverage and, along with that, counties' ability to draw down federal funds through Medi-Cal will diminish, further straining the resources available to counties to maintain existing entitlement responsibilities and to sustain the system expansions recently put into place by the Legislature and the Governor, including the CARE Act, the Behavioral Health Services Act (BHSA)/Proposition 1, and other programs and services focused on the homeless population.

> **As a result, UCC also supports the County Behavioral Health Directors Association's (CBHDA) request for $224 million in 2026-27 and $828 million in 2027-28 based on modeling that suggests that approximately 89,300 individuals are likely to be impacted by H.R. 1.**

The estimate of behavioral health system impacts is based on the following assessments:

- **Work Requirements**. CBHDA estimates that approximately 67,620 individuals in the ACA population will be affected by new H.R. 1 work requirements by 2027-28. Although the work requirements exempt those with serious mental illness (SMI) and substance use disorders (SUD), counties anticipate that some of the individuals who lose their coverage may be receiving behavioral health services through their Managed Care Plan and/or may need it in the future (i.e., the mild to moderate individuals who will decompensate without care). This analysis assumes that these individuals will not obtain insurance through other means and county behavioral health departments will need to serve them "to the extent resources are available" under 1991 Realignment.

- **Biannual Medicaid Eligibility Redeterminations**. An additional impact to the ACA population will result from the biannual Medicaid eligibility redeterminations in H.R. 1. An estimated 8,583 individuals who are served by county behavioral health will fall off of Medi-Cal in 2026-27 and 11,880 individuals will be impacted in 2027-28.

- **Undocumented Immigration Status shift to Restricted Scope**. Counties estimate that approximately 7,365 individuals in 2026-27 and 9,820 individuals in 2027-28 who are currently serviced by county behavioral health will shift from full-scope Medi-Cal to restricted scope Medi-Cal. For specialty mental health services and SUD services specifically, the only services covered under restricted scope Medi-Cal are for those individuals who are pregnant.

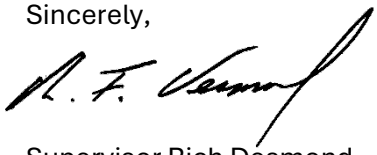
Conclusion

Even prior to the passage of H.R. 1, many urban counties faced growing fiscal strain driven by slowing revenues, inflationary cost pressures, unfunded state mandates, and the impending cost of legal liabilities. Roughly half of UCC counties report 2025–26 deficits, and most expect program reductions in 2026–27. Early county analyses estimate H.R. 1 will reduce urban county budgets by $1.1 billion to $2.2 billion in 2026–27 alone, growing to over $6 billion statewide by 2030. While some counties are exploring local revenue measures, such actions would only partially offset projected federal losses and require local voter approval.

We urgently ask that the Administration and the Legislature invest resources to shore up the foundation of safety net services – eligibility, indigent care, public hospitals, and county behavioral health agencies – as outlined above to support low-income Californians. UCC's member counties stand ready to work collaboratively with state partners to develop realistic mitigation strategies that sustain essential health and human services for low-income Californians.

Thank you for your time and consideration of our request. Please do not hesitate to reach out to Kelly Brooks, UCC's health and human services advocate, with any questions; she is available at (916) 272-0011 or kbl@hbeadvocacy.com.

Sincerely,



Supervisor Rich Desmond
Chair, Urban Counties of California

cc: Honorable Members, Assembly Budget Committee
Honorable Members, Senate Budget and Fiscal Review Committee

URBAN COUNTIES
OF CALIFORNIA

2026 UCC Leadership

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

March 18, 2026

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

Re: H.R. 1 Budget Investments: Medi-Cal & CalFresh Eligibility; County Indigent Care; Public Hospitals; Behavioral Health

Dear Governor Newsom:

On behalf of the Urban Counties of California (UCC), a coalition of the state's 14 most populous counties, I write to respectfully urge you to provide funding to counties to assist with addressing H.R. 1-related impacts. The damage wrought by H.R. 1 is not only significant for vulnerable populations but has the potential to dramatically undermine the fiscal stability of California's urban counties.

This request was developed in collaboration with our sister county associations, including the California State Association of Counties (CSAC), the Rural County Representatives of California (RCRC), and the statewide associations representing county health and human services agency leaders. Together, we seek the state's assistance in addressing the devastating impacts to the vulnerable populations we collectively serve.

H.R. 1 represents a fundamental restructuring of the federal-state-county partnership for provision of safety-net services, with consequences that urban counties cannot absorb without significant policy and fiscal mitigation. Increased uninsured rates, reduced federal support, and major new eligibility requirements for Medi-Cal and CalFresh place counties at the epicenter of implementation with limited capacity to address impacts on our own.

Urban counties request state investment in four areas to mitigate the most devastating harms H.R. 1 will impose on low-income individuals and families accessing health care and food:

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2) Public hospital investments to ensure those remaining on Medi-Cal can access care at public hospitals and clinics.
3) Eligibility investments to help ensure there is trained and sufficient workforce to timely and accurately enroll people in Medi-Cal and CalFresh.
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These investments form a foundation to support low-income Californians and bolster the safety net as we navigate this uncertain time.

Indigent Care Investments

California law requires counties to provide basic health services[1] to indigent adults. Your Administration estimates that nearly 2 million Californians will lose health coverage, including 1.4 million Medi-Cal enrollees. Additionally, the H.R. 1 changes to state-based health marketplaces will drive an estimated 660,000 Californians out of the individual market. As the number of uninsured individuals rises, the demand for county indigent care is projected to increase significantly, with an estimated 417,000 to 1.3 million individuals expected to seek services as they lose Medi-Cal coverage under H.R. 1. Unlike Medi-Cal coverage, county indigent programs are not uniform – covered services and eligibility vary from county to county.

Urban counties have historically delivered indigent care services in two ways: (1) through an affiliated county hospital and clinic system or (2) through contracted providers or a hybrid model that included contracts and county-owned clinics. UCC member counties that own and operate a county hospital and health system include: Alameda[2], Contra Costa, Los Angeles, Riverside, San Bernardino, San Francisco, San Joaquin, San Mateo, Santa Clara, Ventura. The UCC member counties that delivered indigent services through contracted or other arrangements include Fresno, Orange, Sacramento, and San Diego; these counties have significantly reduced their service delivery infrastructure since ACA implementation.

For decades, the state provided funding to counties via 1991 Realignment for indigent care because of state mandate concerns. In 2013, as part of the ACA implementation, 1991 Health Realignment revenues were redirected from local health programs and the growth associated with those funds was significantly slowed to pay for other state services. Consequently, counties do not have the resources to serve individuals who will be seeking health services from indigent programs post-H.R. 1 implementation. Counties anticipate indigent care impacts as early as spring of 2027 as the H.R. 1 Medi-

[1] Welfare and Institutions Code 17000, enacted in 1965, established the legal obligation for counties to provide basic, medically necessary care to medically indigent, lawful residents. County indigent programs are not comprehensive insurance or health coverage programs, like Medi-Cal or commercial health insurance.
[2] The Alameda Health System (AHS) Hospital Authority is an independent public agency established by the Alameda County Board of Supervisors to manage, administer, and control the county's public health care system.

Cal work requirements and semi-annual eligibility redeterminations begin impacting people's coverage.

Counties estimate the statewide cost to provide services to indigent adult population at between $2 billion and $5.5 billion, depending on how many individuals seek services. Additionally, counties must rebuild or expand indigent care programs that were scaled back after the ACA, which requires new investments in staffing, provider capacity, and infrastructure.

> **To ensure that individuals who lose their coverage and fall into the health care safety net are able to access basic health care services, UCC requests at least $700 million in 2026-27, roughly $2.3 billion in 2027-28, and additional – likely increased – support in future years as indigent health care service demands adjust.**

In addition to the indigent care impacts, as more Californians lose Medi-Cal coverage, local health departments increasingly will become the default provider for essential services – such as vaccinations, sexually transmitted infection screening, testing, and treatment – while also absorbing greater demands for communicable disease prevention, response activities, and other core public health functions. To protect community health and ensure continued access to these critical services, we request $92.2 million to support California's local health departments so they can meet rising demand and preserve the public health workforce and infrastructure.

Public Hospital Investments

Urban counties play a key role in the delivery of health care services in their communities – owning and operating hospitals and clinics.

Public hospital systems – which include county hospitals – estimate $3.4 billion in total annual losses from H.R. 1 when fully implemented. Of particular concern, H.R. 1 caps and reduces State Directed Payments (SDPs) that currently compensate for inadequate Medi-Cal base rates, resulting in $2.3 billion in cumulative losses. Additionally, H.R. 1 requires a number of eligibility and enrollment changes that will have devastating impacts to coverage. The new work and community engagement requirements on their own will cause an estimated 1.4 million Californians to lose Medi-Cal coverage, resulting in an $800 million annual loss in Medi-Cal revenue for public hospital systems.

Loss of coverage will increase utilization of uncompensated care and increase the reliance on emergency departments for routine care. It will also increase the number of sicker patients who were unable to get care earlier in their illness. Due to the uncertainty of sustained funding, emergency departments, labor and delivery units, burn and other critical service lines are at risk of closure and/or decreased access. As accessibility to these services declines, there will be a ripple effect on neighboring hospitals/services as patients seek care where it is available. UCC members with county hospitals have direct experience with increased utilization at county hospitals when other hospitals in the region close or reduce services.

Without investment from the State, California's public hospital systems will be unable to sustain current care levels. The consequences will include reduced access to services, increased wait times, staff layoffs, and possibly even facility closures.

> **In line with the request outlined by the California Association of Hospital and Health Systems (CAPH), UCC supports $500 million General Fund in 2026-27 and $850 million in 2027-28 for public hospitals to help stabilize their funding.**

Public hospitals are the only hospitals in the state that receive no State General Fund support for inpatient fee-for-service Medi-Cal. In 2005, the State withdrew its funding for the Medi-Cal match, or Non-Federal Share (NFS) for inpatient fee-for-service patients – a direct and ongoing savings to the General Fund that now totals more than $500 million annually. Every year since then, public hospital systems have had to assume those costs, resulting in a significant loss for each service.

This challenge has been further compounded by low Medi-Cal base rates, which resulted in public hospital systems needing to secure billions of federal dollars in "supplemental" payments to help cover their costs. As with the Medi-Cal fee-for-service payments, public hospital systems provided the federal match for their supplemental payments – no General Fund was involved.

Unfortunately, H.R. 1 capped those supplemental payments – the SDPs – and reduced the Medicaid matching rate. Combined with other state budget decisions, other likely federal cuts, and already existing deficits, these losses could reach nearly $6 billion annually when H.R. 1 is fully implemented.

Consequently, public hospital systems have exhausted their federal options that might be available to cover their costs. Public hospitals need a reinvestment from the state of $500 million annually to ensure they can continue providing critical care to those most marginalized across our state.

Eligibility Investments

First, counties need resources to train and staff the eligibility workforce so that eligible Californians receive the CalFresh and Medi-Cal services they need.

- **Medi-Cal.** H.R. 1 creates two primary barriers for existing Affordable Care Act (ACA) expansion adults that threaten Medi-Cal access and ongoing coverage for millions of otherwise eligible Californians, while creating significant workload for county eligibility staff. These barriers are: (1) the introduction of community engagement and work requirements, and (2) shifting from 12-month to 6-month recertification periods. For new Medi-Cal applications, an additional procedural hurdle has been established for applicants and workers alike: applicants must demonstrate compliance with work and community engagement rules a month prior to enrollment.

The Department of Health Care Services (DHCS) estimates that 4.6 million ACA expansion adults are currently enrolled in Medi-Cal, 2.8 million of whom cannot be automatically renewed nor exempted and for whom intensive county eligibility workforce engagement and support will be required in order to retain coverage. Within this population, DHCS projects a 50% disenrollment rate due to challenges with compliance or paperwork barriers. Under that scenario, 1.4 million enrollees – 3.5% of the state's population – would lose Medi-Cal coverage. DHCS has reported that disenrollment could be as high as 77% based on the experience of other states.

Reducing the disenrollment rate among this vulnerable population hinges on adequate funding and training of the county eligibility workforce. Eligibility workers can properly screen, identify, and certify key exemptions not discoverable through any other means than direct interviews with enrollees to determine who may be exempt from new requirements. Further, eligibility workers support existing enrollees through compliance for individuals who do not qualify for exemptions. Additionally, workers help new applicants navigate the additional hurdle of demonstrating compliance one month before enrollment.

> **Consistent with the request made by the County Welfare Directors Association (CWDA), UCC supports $230 million General Fund in 2026-27 and $305 million General Fund in 2027-28, to provide counties with the necessary funding for the eligibility workforce to support Medi-Cal beneficiaries and mitigate the harm of these H.R. 1 policies.**

- **CalFresh.** H.R. 1 expands work requirements, eliminates eligibility for many immigrant groups, amends the Thrifty Food Plan, eliminates CalFresh Healthy Living (SNAP-Ed), and shifts substantial new administrative and benefit costs to the state and counties. Nearly 954,800 Californians could lose CalFresh, and county administrative costs are estimated to rise by more than $160 million annually in urban counties alone. Higher food insecurity will have cascading effects on family stability, health outcomes, homelessness risk, and child welfare involvement.

  Beginning June 1, 2026, at least 1 in 5 CalFresh recipients are at risk of losing life-saving food assistance due to onerous new work requirements imposed by H.R. 1, which requires proof of 20 hours per week of work, job training, education, or community service. When combined with the Able-Bodied Adult without Dependents (ABAWD) time limit policy, these rules will restrict at least 954,800 CalFresh recipients to only three months of food assistance within a 36-month period unless they are able to comply or qualify for an exemption. The Department of Social Services (CDSS) estimates that 70% of CalFresh recipients who meet the definition of an ABAWD and who are not automatically exempt or verified compliant run the greatest risk of losing benefits. However, this estimate does not include the potential impact of county eligibility workers in reducing discontinuances.

  One-on-one conversations that facilitate trust and rapport between workers and clients will help surface critical information about life circumstances and conditions

that limit an individual's ability to work, ensuring a greater number of individuals who qualify for an exemption such as "unfit for work" are not inappropriately subject to work requirements and can retain access to food assistance. However, your proposed 2026-27 budget currently provides no new resources for workers to partake in retention-focused client-by-client conversations.

> **Along with our colleagues at CWDA, UCC supports augmenting CalFresh funding by $9.3 million General Fund in 2025-26; $102.8 million General Fund in 2026-27; and $57.9 million General Fund in 2027-28 and annually thereafter to address the workload impacts outlined above.**

Behavioral Health Investments

The eligibility, enrollment and financing changes in H.R. 1 will affect county behavioral health plans and delivery systems. As fewer individuals can qualify for and maintain Medi-Cal coverage, counties will see an increase in demand for uncompensated safety net services. First, as individuals with less severe behavioral health conditions lose Medi-Cal eligibility and coverage, this loss of coverage will result in diminished access to upstream behavioral health care for those who may have mild to moderate conditions. The loss of coverage also may lead to exacerbation of mental health and substance use disorder conditions, eventually resulting in the need for specialty services for some of these individuals.

County behavioral health systems are the safety net for uninsured or underinsured Californians with behavioral health needs to the extent resources are available under 1991 Realignment. Despite exemptions for work requirements, thousands of existing clients of county behavioral health will lose coverage and, along with that, counties' ability to draw down federal funds through Medi-Cal will diminish, further straining the resources available to counties to maintain existing entitlement responsibilities and to sustain the system expansions recently put into place by the Legislature and the Governor, including the CARE Act, the Behavioral Health Services Act (BHSA)/Proposition 1, and other programs and services focused on the homeless population.

> **As a result, UCC also supports the County Behavioral Health Directors Association's (CBHDA) request for $224 million in 2026-27 and $828 million in 2027-28 based on modeling that suggests that approximately 89,300 individuals are likely to be impacted by H.R. 1.**

The estimate of behavioral health system impacts is based on the following assessments:

- **Work Requirements**. CBHDA estimates that approximately 67,620 individuals in the ACA population will be affected by new H.R. 1 work requirements by 2027-28. Although the work requirements exempt those with serious mental illness (SMI) and substance use disorders (SUD), counties anticipate that some of the individuals who lose their coverage may be receiving behavioral health services through their Managed Care Plan and/or may need it in the future (i.e., the mild to moderate

individuals who will decompensate without care). This analysis assumes that these individuals will not obtain insurance through other means and county behavioral health departments will need to serve them "to the extent resources are available" under 1991 Realignment.

- **Biannual Medicaid Eligibility Redeterminations**. An additional impact to the ACA population will result from the biannual Medicaid eligibility redeterminations in H.R. 1. An estimated 8,583 individuals who are served by county behavioral health will fall off of Medi-Cal in 2026-27 and 11,880 individuals will be impacted in 2027-28.

- **Undocumented Immigration Status shift to Restricted Scope**. Counties estimate that approximately 7,365 individuals in 2026-27 and 9,820 individuals in 2027-28 who are currently serviced by county behavioral health will shift from full-scope Medi-Cal to restricted scope Medi-Cal. For specialty mental health services and SUD services specifically, the only services covered under restricted scope Medi-Cal are for those individuals who are pregnant.

Conclusion

Even prior to the passage of H.R. 1, many urban counties faced growing fiscal strain driven by slowing revenues, inflationary cost pressures, unfunded state mandates, and the impending cost of legal liabilities. Roughly half of UCC counties report 2025–26 deficits, and most expect program reductions in 2026–27. Early county analyses estimate H.R. 1 will reduce urban county budgets by $1.1 billion to $2.2 billion in 2026–27 alone, growing to over $6 billion statewide by 2030. While some counties are exploring local revenue measures, such actions would only partially offset projected federal losses and require local voter approval.

We urgently request that you and the Legislature invest resources to shore up the foundation of safety net services – eligibility, indigent care, public hospitals, and county behavioral health agencies – as outlined above to support low-income Californians. UCC's member counties stand ready to work collaboratively with state partners to develop realistic mitigation strategies that sustain essential health and human services for low-income Californians.

Thank you for your time and consideration of our request. Please do not hesitate to reach out to Kelly Brooks, UCC's health and human services advocate, with any questions; she is available at (916) 272-0011 or kbl@hbeadvocacy.com.

Respectfully,

Supervisor Rich Desmond
Chair, Urban Counties of California

cc: Secretary Kim Johnson, California Health and Human Services Agency
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