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

ITEM: 2.7
(ID # 30653)
MEETING DATE:
Tuesday, June 23, 2026

FROM : EXECUTIVE OFFICE

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

RECOMMENDED MOTION: That the Board of Supervisors:

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

ACTION:Policy

Jeff Van Wagenen, County Executive Officer 6/18/2026

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Perez, seconded by Supervisor Washington 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:	June 23, 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 other Board direction, coordinated through the Executive Office, which serves as the central clearinghouse for advocacy communications.

Over the past several months, the Executive Office has continued to lead a comprehensive and coordinated effort to advance the County's state and federal priorities. The primary focus has been budget related, including working closely with County departments and multiple coalitions of counties 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" (as directed by the Board of Supervisors in Board Item #30157 on March 4, 2026).

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

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

May 29, 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

Dear Governor Newsom:

On behalf of the County of Riverside Board of Supervisors, thank you for the continued engagement with counties as the State navigates an unpredictable budget environment. With federal actions, economic trends, and State revenues in flux, we recognize the uncertainty ahead and remain committed to working collaboratively to safeguard essential services.

The proposed budget the legislature passed takes important initial steps to prepare for the far-reaching impacts of H.R. 1, the "One Big Beautiful Bill Act" of 2025. These early adjustments acknowledge the scale of the challenge, but much more work is needed. As federal guidance evolves, close coordination will be essential, and we will continue advancing additional H.R. 1 related budget needs.

As counties assume growing responsibilities under shifting federal and state policies, stable and adequate funding remains critical to keeping people housed, healthy, and connected to care. Our priorities reflect a shared commitment to prevention over crisis response and the imperative to maintain the frontline services that uphold California's values and protect our most vulnerable residents.

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

Program: Adult Protective Services (APS)
Governor's May Revision: Proposes a reduction of $70 million State General Fund in 2026-27 and ongoing to revert the expansion of Adult Protective Services adopted in 2021-22, including changing the age of eligibility from 60 back to 65.
RivCo Impact:

- Reduces Critical Protection: A total reduction of 27 full-time employees (FTEs), including 19.2 APS social workers and 7.8 support staff. Leaving a vulnerable segment of our population with reduced protection.

Program: Child Welfare Services (CWS), Title IV-E Stipend Project One-Time Augmentation
Governor's May Revise: Proposes a one-time $18.4 million General Fund allocation to sustain support for students currently enrolled in BSW/MSW programs. This bridge funding provides time to update Title IV-E sharing ratios, so training plans align with allowable federal reimbursement levels for eligible foster youth. However, the State is currently facing a $4.5 million shortfall due to outdated claiming methodologies that did not match ACF-approved rates, resulting in a pause in new BSW/MSW enrollment for the 2026–27 academic year.
RivCo Impact:

- Disrupts the Workforce Pipeline: The IV-E funding stipend and correlated pause in new BSW/MSW student enrollment for the 2026–27 academic year will significantly impact Riverside County's workforce pipeline. Due to these changes, universities may reduce or discontinue their IV-E programs, affecting more than 200 students statewide.
- Undermines Local Training Models: Locally, this directly challenges our division's internship and workforce development model, which places IV-E BSW/MSW interns in our training region to carry cases and gain practical experience, creating a reliable pipeline of job-ready candidates after graduation. It also threatens opportunities for current staff participating in our 20/20 program, which allows social workers to return to school for their MSW.
- Shrinks Future Talent and Professional Development: Reductions in IV-E enrollment and the master contract will limit our intern placements, shrink the pool of qualified future hires, and impact professional development for existing staff, ultimately posing long-term risks to maintaining a strong and prepared child welfare workforce in Riverside County.

Program: In-Home Support Services (IHSS) – Cost Shift for Growth in Assessed Hours
Governor's May Revision: Proposes a $233.6 million State General Fund reduction by removing the State's share of costs associated with growth in IHSS hours per case and shifting those costs to counties beginning in FY 2027-28.
RivCo Impact:

- Imposes Major New Costs: Although no formal allocation methodology has been released, using caseload share as a proxy illustrates the magnitude of the impact. Riverside County represents approximately 7% of the statewide IHSS caseload. Based on this share, the proposed shift would impose roughly $16 million on new IHSS program costs on Riverside County—equivalent to the loss of 69 IHSS social workers and 28 support staff.
- Creates Serious Operational Risks: Such staffing losses would lead to major delays in intake processing, rising numbers of overdue reassessments, and increased risks for vulnerable IHSS clients. These impacts would also make it difficult to meet state-mandated timelines, putting the County at risk of additional financial penalties.
- Triggers Additional Cuts Through Realignment: If counties must absorb the IHSS cost shift through the 1991 Realignment, the resulting fiscal pressure would force reductions in APS staffing. This would further erode safety-net services for at-risk adults across Riverside County.

Program: In-Home Support Services (IHSS) - Community First Choice Option (CFCO) Penalties
Governor's May Revision: Proposes $92.1 million in State General Fund savings in FY 2026-27 by shifting CFCO penalty costs to counties. Beginning July 1, 2026, counties will assume 100% of CFCO penalty costs.
RivCo Impact:

- Highlights Significant Penalty Exposure: Riverside County currently serves 63,069 continuing IHSS clients, including 36,572 CFCO recipients—meaning 58% of our caseload is subject to potential penalties. This demonstrates the substantial scale of risk the County faces under the current requirements.
- Increases Operational Strain and Penalty Risk: While Riverside County has historically maintained low CFCO penalties, averaging just $1,200 per month, the penalty formula is projected to double in FY 2026–27. To avoid major penalties, counties must shift limited staff toward CFCO workload, creating delays in IHSS intake and growing backlogs for new applicants and non-CFCO reassessments.
- Escalates Penalties Under Staffing Reductions: If the staffing cuts outlined in the May Revision move forward, counties will be unable to meet reassessment deadlines. As a result, CFCO penalties are expected to rise sharply, compounding the operational and fiscal pressures facing Riverside County. Riverside County currently serves 63,069 continuing IHSS clients, of whom 36,572 (58%) are CFCO cases—illustrating the scale of exposure to penalty risk.

Program: In-Home Support Services (IHSS) - Conforming IHSS Residual Program (IHSS-R) with Medi-Cal Coverage
Governor's May Revision: Proposes $86 million in State General Fund savings in FY 2026-27 and ongoing by aligning the IHSS Residual Program with the timing of Medi-Cal coverage.
RivCo Impact:

- Creates Widespread Service Disruptions: An estimated 10,356 IHSS clients would lose services each year due to short-term lapses in Medi-Cal eligibility. This would disconnect vulnerable residents from essential care despite the temporary nature of their coverage gaps.
- Generates Continuous Churn: Most affected clients are expected to quickly re-establish Medi-Cal eligibility, resulting in repeated reinstatement of IHSS services. This cycle increases instability for clients who rely on uninterrupted support.
- Overwhelms County Workload: The churn will significantly strain county staff, who must repeatedly reinstate cases terminated solely due to brief Medi-Cal interruptions. This added administrative burden diverts resources from timely assessments and ongoing case management.

Program: In-Home Support Services (IHSS) - Medi-Cal Assets Test Limits
Governor's May Revision: Proposes a reduction of $62.6 million in the General Fund in 2026-27 to conform IHSS with the reinstatement of the Medi-Cal asset limit for seniors and disabled adults to $2,000 for an individual or $3,000 for a couple, effective no sooner than January 1, 2027.

RivCo Impact:

- Risks Large-Scale Service Interruptions: Riverside County processes more than 24,000 IHSS applications each year and serves 63,069 continuing clients, highlighting the scope of potential disruption if Medi-Cal eligibility lapses occur. An estimated 3,200 current clients would lose Medi-Cal and, therefore, IHSS services under the proposed changes.
- Blocks Access for Newly Eligible Residents: Reinstating the Medi-Cal asset test is expected to prevent roughly 1,200 otherwise eligible individuals from qualifying for Medi-Cal and, by extension, IHSS each year. This policy change reduces access to essential in-home support for low-income seniors and adults with disabilities.
- Drives Higher Emergency and Institutional Care Costs: Loss of IHSS support is anticipated to increase reliance on emergency medical services, emergency room utilization, and skilled nursing facility placements. These downstream impacts raise costs for counties and the broader health system as residents lose access to stabilizing in-home care.

Program: Medi-Cal Assets Test Limits (Non-IHSS)
Governor's May Revision: Reinstates Medi-Cal asset limits of $2,000 for individuals and $3,000 for couples starting no sooner than January 1, 2027, generating $278.3 million in FY 2026–27 savings and $495.6 million ongoing. A partial reinstatement took effect January 1, 2026. The State projects 25,000 individuals will lose coverage in 2026–27, increasing to 37,000 in 2027–28.
RivCo Impact:

- Coverage Loss Risk: About 139,563 Riverside County Medi-Cal recipients are subject to asset testing and face increased risk of disenrollment, especially seniors and people with disabilities. Many may need to spend down limited resources to maintain eligibility.
- Higher Workload: Applying asset tests adds roughly 30 minutes per application or renewal due to spend-down explanations, document verification, and good-cause extensions.
- More Administrative Burden: Heavy reliance on advocates and assistance companies increases call volume and requires additional time to verify and coordinate with authorized representatives.

Program: Medi-Cal Mobile Crisis Services
Governor's May Revision: 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
Governor's May Revision: The proposed budget includes an additional $50 million in distressed hospital grants in addition to the $25 million included in AB 108.
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: Moving toward a forgiveness and grant structure is urgently needed to stabilize rural hospitals and prevent cascading losses in federal funding, access to care, and regional health system capacity.
- 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. Moving towards a forgiveness and grant structure better meets the needs rural hospitals face.

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

Program: Homeless Housing, Assistance and Prevention (HHAP) Program
Governor's May Revision: Proposes $500 million for Round 7 of the HHAP program, streamlines applications, creates some flexibilities, but adds a local match.
RivCo Impact:

- Creates Ambiguity in Funding Requirements: The broad matching requirement remains unclear for counties like ours, especially where allocations cover jurisdictions outside the City of Riverside, leaving it uncertain whether fee waivers or general fund contributions from other cities qualify. Clear guidance is needed on how State dollars can appropriately serve as a match for other State funds to prevent inconsistent or inequitable application.
- Risks Redirecting Regional Resources: The requirement to obtain and maintain a Pro-Housing Designation could shift millions of dollars away from regions with demonstrated need and operational capacity. To ensure continuity, funds should first flow to the local Continuum of Care when a jurisdiction lacks the designation, preserving regional stability and allowing counties like Riverside to receive allocations if neighboring jurisdictions lose their status.

Program: Veteran Service Office Fund (VSOF)
Governor's May Revision: 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

Governor's May Revision: 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

Governor's May Revision: The Governor's January Budget does not extend the existing $65 million in statewide backfill funding set to expire June 30, 2026.

RivCo Impact:

- 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) 236-6402 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

CORRESPONDENCE

GENERAL LETTERS SENT FROM THE BOARD

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

June 10, 2026

Ms. Anja Aulenbacher, Associate Deputy Director
Programming - Active Transportation Program
California Transportation Commission
1120 N Street
Sacramento, CA 95814

RE: Letter of Support for Riverside County Regional Park and Open-Space District's Connecting Tri-County Active Transportation: BNSF Railroad Overcrossing Project

Dear Ms. Aulenbacher and Members of the Selection Committee:

On behalf of the Riverside County Board of Supervisors, I write in strong support of Riverside County Regional Park and Open-Space District's (RivCoParks') application for 2027 Active Transportation Program (ATP) Large Infrastructure Grant funding, for its **Connecting Tri-County Active Transportation: BNSF Railroad Overcrossing Project ("Project")**. The Project will grade separate an existing at-grade, shared-use path/rail crossing by constructing a bridge to span a segment of the BNSF rail corridor. This segment consists of three parallel mainline tracks that serve both freight and passenger rail operations.

Safety improvements are critically needed at this crossing, which currently lacks gates and warning signals, and where tragically, a death has already occurred. The crossing intersects with the Santa Ana River Trail (SART), a local trail system heavily used by commuters and recreational users traveling by foot and bicycle, as well as by equestrians. ATP grant funding will improve safety at this intersection via installation of a new, grade-separated crossing, eliminating a hazardous conflict point and improving connectivity for underserved communities in the surrounding area (such as cities of Corona and Chino Hills, and other communities in Orange and San Bernardino Counties). In doing so, this Project's safety improvements will both help prevent future crossing collision tragedies and advance a broader initiative to safely connect underserved communities in the Riverside County region to segments of the SART in Orange and San Bernardino Counties (ranging from the Pacific Ocean to the San Bernardino Mountains); and advance area governments' shared vision of a local, multi-regional contiguous trail system.

As the population of Southern California, a region already known for some of the country's worst traffic congestion, continues to grow, it is increasingly important to provide connectivity to safe, alternative commuting routes such as the SART. The Santa

Ana River Watershed area alone is home to seven million ethnically diverse residents. The SART provides an unparalleled location for these residents to appreciate the natural landscapes of the Santa Ana River Watershed, while ensuring their access to regional amenities. Once the trail is completed, it will provide free access to these spaces for users of all income levels, including those in communities that State Senate Bill (SB) 535 have designated as disadvantaged.

A safe rail/pedestrian crossing for SART's well-connected regional trail system will enhance access to active transportation options and outdoor recreational amenities, in turn bolstering economic opportunities and promoting healthier lifestyles for local communities. As Chair of the Riverside County Board of Supervisors, I respectfully ask that you give RivCoParks' ATP grant application your full and fair 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

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 authorizes $10 billion in bonds for a range of environmental and climate resilience projects. The bill exempts the development and adoption of program guidelines and selection criteria for competitive grant programs funded by the Act from the standard requirements of the Administrative Procedure Act, allowing for a more streamlined process. Instead, state entities administering these programs must develop draft guidelines, transmit them to relevant legislative committees, publish them online for at least 30 days of public comment, hold a public meeting, and respond in writing to all public comments. Finalized guidelines must be submitted to the Secretary of the Natural Resources Agency, who will verify their consistency with applicable statutes and post them online, except for certain exemptions such as the State Water Resources Control Board and programs funded by specific 2025 budget appropriations. The bill also mandates annual public reporting of all program and project expenditures, including detailed information on project objectives, costs, funding sources, and benefits to vulnerable or disadvantaged communities. Additionally, it requires independent audits of expenditures and allows for further audits if improprieties are found. The costs of oversight, audits, and administration are to be funded proportionally from the bond proceeds. The urgency clause ensures the bill takes immediate effect, citing the need to address heightened risks from climate change, such as wildfires, drought, and threats to safe drinking water, and to enable prompt distribution of funds in line with voter intent.	Read second time and amended. Re-referred to Committee on Appropriations	Support	Support	Support	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB35
A.B.53: Native American tribes: fish and wildlife: conservation and mitigation lands.	CA Assemb. James Ramos (D-CA-045)	Assembly Bill 53, as amended in the 2025–26 California legislative session, modifies several sections of the Fish and Game Code and the Public Resources Code to expand the eligibility of federally recognized Native American tribes to participate in state conservation programs. Specifically, the bill authorizes the Wildlife Conservation Board to award grants and loans for riparian and wetland habitat conservation programs to federally recognized tribes, in addition to the previously eligible local, state, federal agencies, and nonprofit organizations. The Department of Fish and Wildlife is also empowered to enter into management agreements for department-managed lands with federally recognized tribes, alongside nonprofit conservation groups and resource conservation districts. Furthermore, the bill amends the rules governing the sale or transfer of conservation lands, allowing such transactions to federally recognized tribes for purposes such as improving conservation management, public access, historic preservation, or enhancing biological value, aligning tribes with other public agencies and nonprofits in these processes. The bill does not introduce new funding allocations or specific financial figures, but it does broaden the pool of eligible recipients for existing conservation grants and management opportunities. There are no new deadlines or timelines established by the bill. The key changes are insertions of "federally recognized tribes" into the relevant statutes, thereby granting tribes parity with other entities in accessing state conservation resources and participating in land management and transfer agreements. These amendments align with the mission of organizations focused on Native American rights, environmental conservation, and equitable access to natural resources. By explicitly including federally recognized tribes in state conservation programs and land management opportunities, the bill supports tribal sovereignty, enhances tribal participation in environmental stewardship, and recognizes the important role tribes play in conservation and habitat restoration efforts. The changes also promote collaborative management of California's natural resources and may improve conservation outcomes by leveraging tribal expertise and traditional ecological knowledge. In summary, AB 53 expands the eligibility of federally recognized Native American tribes to receive conservation grants, manage state lands, and acquire conservation lands, thereby promoting greater tribal involvement in California's environmental stewardship and aligning with goals of equity and inclusion in natural resource management.	Re-referred to Committee on Natural Resources And Water	Support			https://leginfo.legislature.ca.gov/faces/billnavclient.xhtml?bill_id=202520260AB53

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.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.	From committee: Do pass and re-refer to Committee on Appropriations (Ayes 4. Noes 1.) (June 17). Re-referred to Committee on Appropriations	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
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

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.735: Planning and zoning: logistics use developments: truck routes.	CA Assemb. Juan Carrillo (D-CA-039)	Assembly Bill 735, as amended in the 2025–26 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 months' 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 protected units without meeting additional criteria. For air quality monitoring, the bill amends requirements for the South Coast Air Quality Management District, allowing the use of a combination of new and existing air monitoring data to evaluate pollutant concentrations near	Ordered to inactive file at the request of Senator Reyes.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB735
A.B.736: The Affordable Housing Bond Act of 2026.	CA Assemb. Sharon Quirk-Silva (D-CA-067), CA Assemb. Buffy Wicks (D-CA-014), CA Assemb. Matt Haney (D-CA-017)	Assembly Bill No. 736, known as the Affordable Housing Bond Act of 2026, proposes the issuance of $10 billion in bonds to fund affordable housing initiatives in California. The bill outlines the allocation of these funds to various programs, including $5 billion for the Multifamily Housing Program, $1.7 billion for supportive housing, $800 million for the Portfolio Reinvestment Program, and $500 million for the acquisition and rehabilitation of housing units. Additionally, $1 billion is designated for home ownership opportunities through programs like the CalHome Program, and $350 million for the Joe Serna, Jr. Farmworker Housing Grant Program. The bill also includes $400 million for the Infill Infrastructure Grant Program. The bond act is set to be voted on by the public during the June 2, 2026, statewide primary election. The legislation is designed to take effect immediately as an urgency statute to expedite the preparation and analysis of the bond issuance.	Read second time. Ordered to third reading.	Watch	Active Watch		https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB736
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

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A.B.826: Deceptive practices: service members and veterans.	CA Assemb. Jeff Gonzalez (R-CA-036)	Assembly Bill 826, as amended in the 2025–26 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 veterans' benefits or entitlements must include clear, standardized disclosures if the advertiser is not authorized to file veterans' benefit claims or is not affiliated with official veterans' organizations. These disclosures must be presented in the same type size and font as the term "veteran" 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 veterans' 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 veterans' 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
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 obligations for financial institutions, and new client notification procedures, all aimed at improving the detection and reporting of financial abuse against elders and dependent adults. These changes align with the mission of organizations focused on elder justice, financial protection, and the prevention of exploitation of vulnerable adults by increasing accountability and awareness within financial institutions and providing additional avenues for intervention.	Referred to Coms. on Committee on Banking and Financial Institutions and JUD.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB871

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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
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 California'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: Vehicles: local regulation: Department of Transportation.	CA Assemb. Jeff Gonzalez (R-CA-036), CA Assemb. Greg Wallis (R-CA-047)	Assembly Bill 1145, as amended, modifies Section 21104 of the California Vehicle Code to enhance the process by which local authorities may enact ordinances or resolutions affecting state highways. Under the revised law, local ordinances or resolutions that impact state highways must be submitted in complete form to the Department of Transportation (Caltrans) for approval before enactment. The bill introduces a new requirement for Caltrans to consider the costs of the proposed local ordinance or resolution in comparison to possible alternative solutions to the issue being addressed. If Caltrans rejects a proposed ordinance or resolution, it must now provide written reasons and justifications for the rejection to the submitting local authority. The bill maintains that ordinances or resolutions adopted under certain sections may still apply to streets maintained by community services districts and allows for fines up to $100 for violations. Previous provisions in earlier versions of the bill, which would have required Caltrans to conduct a comprehensive safety study on State Highway Route 74 and report findings to the Legislature by December 31, 2027, have been removed in the current version. The bill does not allocate specific funding or establish new deadlines beyond the procedural requirements for Caltrans' review and response. The key focus of the legislation is to increase transparency and accountability in the approval process for local regulations affecting state highways, aligning with goals of good governance and effective intergovernmental collaboration.	From committee chair, with author's amendments: Amend, and re-refer to committee. Read second time, amended, and re-referred to Committee on Transportation	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
A.B.1331: Workplace surveillance.	CA Assemb. Sade Elhawary (D-CA-057)	Assembly Bill No. 1331, as amended in the 2025–26 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 authority of the Attorney General or local prosecutors to enforce its provisions. It also maintains that employers must comply with any federal or state laws that require or prohibit certain surveillance practices.	Ordered to inactive file at the request of Senator Limón.	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 California Information Practices Act of 1977, with the most notable change being the removal of the exemption for local agencies, thereby extending the Act's privacy requirements to counties, cities, school districts, and other local public agencies beginning January 1, 2028. The bill broadens the definition of 'personal information' to include a wider array of data types, such as biometric, genetic, neural, geolocation, and digital identifiers, as well as information contained in various physical and digital formats. Agencies will be required to provide individuals with notice regarding the collection of personal information at least once every three years, rather than annually, and must maintain records of the sources of collected information in an accessible manner. The legislation introduces stricter rules for the use and disclosure of personal information. Agencies are prohibited from using personal information for purposes other than those for which it was collected, unless otherwise authorized by state or local law, and must establish rules of conduct for employees handling such data, subject to collective bargaining agreements. The bill revises the circumstances under which personal information may be disclosed, including new provisions for sharing data related to real property, social safety net programs, and medical information, provided certain safeguards and memoranda of understanding are in place. It also enhances requirements for accounting and retention of disclosures, and mandates that agencies notify affected individuals of data breaches in a timely and standardized manner, with specific content and format requirements for breach notifications. Disciplinary measures are expanded to include not only intentional but also negligent violations of the Act by agency officers or employees, and the bill removes the previous requirement that wrongful disclosure of medical, psychiatric, or psychological information must result in economic loss or personal injury to be punishable as a misdemeanor. The bill also clarifies the rights of individuals regarding their personal information and the authority of district attorneys to request disclosures under certain conditions. Legislative findings emphasize the need to balance public access to government information with individual privacy in light of technological advancements. The bill acknowledges that its provisions may impose new state-mandated local programs and crimes, and addresses reimbursement procedures for local agencies and school districts if the Commission on State Mandates determines that additional costs are incurred. No specific funding allocations are detailed in the bill, but it provides	In committee: Set, second hearing. Hearing canceled at the request of author.	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
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.	Referred to Coms. on HEALTH and Committee on Public Safety	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1607

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A.B.1623: Planning and zoning: regional housing needs allocation and annual report: student housing quarters.	CA Assemb. Laurie Davies (R-CA-074)	Assembly Bill 1623, introduced in the 2025–26 California legislative session, proposes amendments to the Government Code to address the inclusion of student housing in the state's regional housing needs allocation (RHNA) process. The bill mandates that certain types of student housing quarters, as determined by the Department of Housing and Community Development (HCD), constructed within a local government's jurisdiction—regardless of whether they have received final entitlements, building permits, or certificates of occupancy—must be counted toward that locality's share of lower-income housing requirements under RHNA. This change aims to more accurately reflect the housing needs of student populations, which have historically been underrepresented in housing element planning, and to mitigate the displacement effect where students compete with low-income families for limited off-campus housing. The bill also requires local governments to report annually, by April 1, the number and income category of these student housing quarters built during the housing element cycle, expanding the scope of data included in the annual housing progress report. This reporting requirement constitutes a state-mandated local program, but the bill specifies that no state reimbursement is required, as local agencies have the authority to levy fees to cover these costs. The legislation applies to all cities and counties, including charter cities, and is justified as a matter of statewide concern due to the severity of California's housing shortage and the unique needs of student populations. The bill aligns with recommendations from HCD's 2024 "California's Housing Future 2040" report, which called for the explicit inclusion of student housing in local housing elements. No specific funding allocations are included in the bill, and the changes are intended to take effect in time for annual reports due by April 1, 2027, and subsequent housing element cycles.	Referred to Coms. on Committee on Housing and Community Development and L. GOV.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1623
A.B.1729: State employment: telework programs.	CA Assemb. Alex Lee (D-CA-024)	Assembly Bill 1729, as amended, revises California's existing statutes regarding state employee telecommuting by replacing the term 'telecommuting' with 'telework' and updating its definition to encompass the use of computers or teleworking technologies as a substitute for commuting. The bill mandates that every state agency develop and implement a telework plan in areas where telework is practical and beneficial, and requires agencies whose operational needs necessitate in-person work to provide written justification to both the Department of General Services (DGS) and their employees. Notably, the bill removes previous exemptions for the California Highway Patrol, Department of Forestry and Fire Protection, and Department of Corrections and Rehabilitation from this justification requirement. The DGS is tasked with overseeing telework programs, coordinating interagency information exchange, developing policies and guidelines, assisting with satellite workstations, and establishing a public telework dashboard that reports on cost-effectiveness, efficiency, and environmental benefits, including annual savings from reduced office space and operating costs. Additionally, each state agency must evaluate its telework program every ten years to ensure alignment with operational needs and workforce recruitment and retention goals, with DGS providing evaluation criteria and recommending modifications as needed. The bill highlights potential annual cost savings of up to $225 million from reduced office space and positions telework as a strategy to reduce air pollution, traffic congestion, and commuting costs, while enhancing employee flexibility and productivity. Declared as an urgency statute, the bill is designed to take immediate effect to address projected state budget deficits and support long-term workforce strategies.	From committee: Do pass and re-refer to Committee on Governmental Organization (Ayes 4. Noes 1.) (June 17). Re-referred to Committee on Governmental Organization	Watch-High Priority			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1729
A.B.1821: California Public Records Act: methods of submission, fees, and agency response time.	CA Assemb. Blanca Pacheco (D-CA-064)	Assembly Bill 1821 amends Sections 7922.530 and 7922.535 of the California Government Code, which govern the California Public Records Act (CPRA). The bill requires state and local agencies to designate a physical office location and a specific email address for the submission of public records requests, and allows agencies to designate additional reasonable submission methods, such as a mailing address or online portal. Agencies must accept requests submitted in person at the designated office or via the designated email during normal business hours, and must clearly post all designated submission methods and any updates on their websites. Requests are considered properly submitted only if made through these designated methods, and agencies are not bound by statutory response timelines for requests submitted through non-designated channels unless they were reasonably aware of the request. The bill also introduces a new fee structure for commercial use requests, requiring payment for search and review time at specified hourly rates ($22.35 for administrative and $66.26 for professional time, both adjustable for cost of living), while exempting educational, noncommercial scientific institutions, government agencies, and news media representatives. Agencies may petition the court to impose these fees on requesters found to have acted with malicious intent, and agency response duties are suspended during such proceedings. The bill clarifies definitions for commercial use, news media, and search and review time, and maintains that requesters may use their own equipment to copy records on agency premises, subject to reasonable limitations to protect records and agency operations. Additionally, the bill extends the response period for agencies from 10 calendar days to 10 business days, with possible extensions up to 14 business days under specified unusual circumstances, such as voluminous requests, need for consultation, cyberattacks, or states of emergency. The legislation includes findings that these changes balance public access rights with the need for agencies to manage requests efficiently and recover costs, while also acknowledging that these provisions may limit public access in certain respects to protect agency resources and operations.	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		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 delivery of new and improved passenger rail services, particularly in areas lacking current service. The bill also retains provisions for public engagement and equity analysis for large projects, aligning with goals of transparency and community impact mitigation. However, by relaxing the zero-emission requirement, the bill may raise concerns among environmental advocates about potential increases in emissions from new rail projects, especially in nonattainment areas, though	Referred to Committee on Natural Resources	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1855
A.B.1883: Workplace surveillance tools.	CA Assemb. Isaac Bryan (D-CA-055)	Assembly Bill 1883, as amended, establishes new regulations in California governing the use of workplace surveillance tools by employers. The bill prohibits employers from using surveillance technologies for certain purposes, such as preventing compliance with labor or civil rights laws, making inferences about workers' emotional states, gait, or neural data, or inferring protected characteristics like veteran status, ancestry, religion, or disability. The use of facial recognition technology is specifically restricted, and employers are barred from using it to make inferences about workers for disciplinary actions such as firing or deactivation. However, the bill allows for the use of surveillance tools for safety purposes, provided they do not use artificial intelligence to make prohibited inferences. The legislation provides enforcement authority to the Labor Commissioner, public prosecutors, and allows employees to bring civil actions for violations, with penalties of up to $500 per violation and the possibility of injunctive relief and attorney's fees. Notably, the bill exempts certain uses of workplace surveillance and artificial intelligence tools when required by federal statutes, regulations, or contracts related to national security, military, space, or defense purposes. The bill applies statewide, including to charter cities, and does not preempt local ordinances that offer equal or greater protections to workers. The legislation aligns with organizational missions focused on worker privacy, civil rights, and the ethical use of technology in the workplace, while also recognizing necessary exceptions for federal compliance in sensitive sectors.	In Senate. Read first time. To Committee on Rules for assignment.	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, attorney'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 bill'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 employment conditions. By mandating disclosure and accountability, the bill seeks to mitigate risks associated with the deployment of AI in the workplace and to empower workers with information about how technology may influence their employment. Overall, AB 1898 represents a comprehensive approach to regulating workplace AI tools, balancing innovation with	In committee: Held under submission.	Oppose	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1898
A.B.1961: Civil actions: protective orders: workplace violence.	CA Assemb. Patrick Ahrens (D-CA-026)	Assembly Bill 1961 amends Section 527.8 of the California Code of Civil Procedure to expand the authority of employers in seeking workplace violence restraining orders. Under current law, employers or collective bargaining representatives may petition for restraining orders on behalf of employees who have suffered harassment, unlawful violence, or credible threats of violence, and, at the court's discretion, for other employees at the workplace. AB 1961 modifies this by allowing employers to seek restraining orders on behalf of all employees at a specific workplace or location where a group of employees perform their primary job duties, even if the threat is not directed at a specific individual but at the workplace or group as a whole. The bill removes the requirement to name individual employees as protected parties in such cases, streamlining the process for employers to protect their workforce collectively. The legislation requires the Judicial Council to adopt or modify relevant court forms by January 1, 2028, to accommodate these changes. The bill clarifies definitions related to harassment, credible threats of violence, and unlawful violence, and affirms that volunteers and independent contractors are included as employees for the purposes of these protective orders. It also maintains that the law does not permit courts to issue restraining orders that infringe on constitutionally protected activities, such as free speech or activities protected by labor law. Procedurally, the bill outlines the process for obtaining temporary restraining orders, including timelines for hearings (within 21 to 25 days), service requirements, and the duration of orders (up to three years, with possible renewal). It also details the responsibilities of law enforcement in serving and enforcing orders, and the requirement for respondents to relinquish firearms while under a protective order. The bill specifies that there are no filing fees for petitions or responses related to workplace violence, and no fees for service of process by law enforcement in cases involving stalking, unlawful violence, or credible threats. AB 1961 does not alter or expand the employer's existing duty to provide a safe workplace but provides an additional legal tool for employers to address threats of violence more broadly. The bill aligns with the mission of organizations focused on workplace safety, employee protection, and violence prevention by making it easier for employers to proactively safeguard all employees in the face of generalized threats, rather than being limited to protecting only specifically named individuals.	From committee: Amend, and do pass as amended and re-refer to Committee on Appropriations with recommendation: To Consent Calendar. (Ayes 11. Noes 0.) (June 16).	Support	Support	Flagged	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1961

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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 services—defined as the aseptic surgical sterilization of 20 or more dogs, cats, or rabbits within 12 consecutive hours by a veterinarian—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.	From committee: Do pass and re-refer to Committee on Appropriations (Ayes 11. Noes 0.) (June 15). Re-referred to Committee on Appropriations	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2010
A.B.2027: Worker data: prohibitions: artificial intelligence.		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 worker'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 workers' personal information for these AI-related purposes. Contracts between employers and vendors must include requirements for reasonable security procedures to protect workers' 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 attorney'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 new deadlines or timelines for compliance beyond the standard legislative process. The bill applies statewide, including to charter cities, emphasizing its broad scope and intent to address a matter of statewide concern. Overall, AB 2027 seeks to protect workers from the misuse of their personal information in AI systems that could	In committee: Held under submission.	Bill Died- No Stance Needed	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2027
A.B.2080: Investment of funds: delegation to county treasurer.	CA Assemb. Natasha Johnson (R-CA-063)	Assembly Bill 2080, as amended, modifies the rules governing the delegation of investment authority by county boards of supervisors to county treasurers in California. Under current law, such delegations must be made by ordinance and are limited to one-year periods, with revocation also requiring an ordinance. This bill removes the requirement that delegations and revocations be made by ordinance and eliminates the one-year limitation, allowing delegations to continue until explicitly revoked by the board. The bill also changes reporting requirements: rather than allowing the board to set monthly or quarterly reporting intervals, it mandates that the county investment policy require the treasurer to provide both monthly and quarterly reports on investment transactions. These changes are intended to streamline the delegation process and enhance transparency and oversight through regular reporting. The bill does not introduce new funding provisions, appropriations, or state-mandated local programs, nor does it alter the authority of county treasurers to invest funds under other sections of the Government Code. The primary impact is to provide counties with greater flexibility in delegating investment authority while ensuring consistent reporting standards, aligning with goals of efficient local government financial management and accountability.	From committee chair, with author's amendments: Amend, and re-refer to committee. Read second time, amended, and re-referred to Committee on Local Government	Watch			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2080

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A.B.2091: Board of supervisors: debt collection.	CA Assemb. Natasha Johnson (R-CA-063)	Assembly Bill 2091 proposes an amendment to Section 26220 of the California Government Code, which governs the authority of county boards of supervisors regarding the assignment of delinquent debts for collection. Under current law, a board of supervisors, with the approval of the tax collector, may assign delinquent unsecured taxes for collection 90 days after they become due and delinquent, but only if the tax collector determines that the remedy of seizing and selling the property will not be used. AB 2091 removes this condition, allowing boards of supervisors, with tax collector approval, to assign any or all delinquent unsecured taxes for collection after 90 days without requiring a judgment from the tax collector about alternative remedies. The bill does not introduce new funding provisions, deadlines, or state-mandated local programs, nor does it alter the process for assigning other types of delinquent accounts or secured tax obligations. The key change is the elimination of the tax collector's discretionary judgment as a prerequisite for assigning delinquent unsecured taxes, which may streamline and potentially expedite the debt collection process for counties. This modification aligns with efforts to enhance local government efficiency in revenue collection, a core concern for organizations focused on public finance and local government operations.	Referred to Committee on Local Government	Bill Died- No Stance Needed			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2091
A.B.2224: County recorders: fees.	CA Assemb. Heather Hadwick (R-CA-001)	Assembly Bill 2224, as amended in the 2025–26 California legislative session, introduces significant changes to the statutes governing county recorders and the fees associated with recording official documents. The bill increases the base fee for recording and indexing the first page of an instrument, paper, or notice from $10 to $15, and for each additional page from $3 to $4, while eliminating additional fees for nonconforming print spacing and page dimensions. These fees are now required to reflect only the reasonable costs of providing recording services, and certain fee revenues are restricted for use solely by the county recorder's office, particularly for modernizing and maintaining document systems. The bill also mandates that county recorders implement an electronic recording delivery system by January 1, 2028, and removes the sunset date for broader contracting authority for electronic recording, thereby making permanent the ability for county recorders to contract with a wider range of entities for electronic document submission and recording. The legislation repeals several provisions related to additional indexing fees and modifies the calculation of fees for recording releases of liens executed by government entities, basing the fee on the rate in effect when the original lien was recorded without fee. It also clarifies and standardizes the process for correcting errors in recorded document indexes and expands the types of documents eligible for secure electronic recording beyond just reconveyances, substitutions of trustee, or assignments of deed of trust. The bill further strengthens the regulatory framework for electronic recording delivery systems, requiring the Attorney General to adopt and oversee regulations ensuring security, reliability, and uniformity, and to conduct local inspections and audits as necessary. In terms of funding, the bill specifies that certain portions of the recording fees are to be used exclusively for the modernization and operation of county recording systems, and for specific programs such as social security number truncation and restrictive covenant programs, subject to periodic review and reauthorization by county boards of supervisors. The bill also provides that no state reimbursement is required for the new duties imposed on counties, as local agencies have the authority to levy sufficient fees to cover these costs. Key points relevant to organizations focused on government transparency, public access to records, and modernization of public services include the mandated transition to electronic recording statewide, the elimination of outdated or unnecessary fees, and the standardization of fee structures to improve clarity and reduce recording rejections. The bill's emphasis on using fee revenues for technological upgrades and secure, accessible	From committee: Do pass and re-refer to Committee on Appropriations (Ayes 6. Noes 0.) (June 17). Re-referred to Committee on Appropriations	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 2025–26 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 governments—defined as cities, counties, or city and county entities, including charter jurisdictions—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 locality'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 pilot'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.	Referred to Committee on Transportation	Sponsored			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2307
A.B.2508: Public Utilities Public Purpose Programs Fund.	CA Assemb. Josh Hoover (R-CA-007)	Assembly Bill 2508 proposes significant reforms to the funding and administration of California's public purpose energy programs. The bill establishes the Public Utilities Public Purpose Programs Fund, which will be financed through appropriations from the Greenhouse Gas Reduction Fund rather than through charges on electricity customers' rates. Beginning January 1, 2027, the California Public Utilities Commission (CPUC) will annually determine and publish the amount needed to fund these programs for the following fiscal year, and, upon legislative appropriation, the State Controller will transfer the necessary funds. The CPUC will then allocate these funds to support a range of public purpose programs, including energy efficiency, renewable energy, research and development, rate assistance for eligible food banks, and home insulation assistance, as well as programs administered by electrical regional energy networks. Notably, the bill excludes the Family Electric Rate Assistance and CARE programs from this new funding mechanism, which will continue to be funded separately. The legislation amends multiple sections of the Public Utilities Code and the Public Resources Code to reflect this new funding structure, repealing the existing charges on electrical service that previously funded public purpose programs. Instead, these programs will now be supported by the new fund, with the intent to provide electricity rate relief and more equitably distribute the costs of programs that benefit all taxpayers, not just utility customers. The bill also maintains the CPUC's oversight and administrative responsibilities, ensuring continuity of services and minimizing customer disruptions during the transition. It further clarifies that the costs of certain programs, such as the Arrearage Management Program and Percentage of Income Payment Plan pilot, will be allocated from the new fund. Key modifications include the requirement for electrical corporations to establish separate accounts for funds allocated from the new fund, updated procedures for third-party and community choice aggregator administration of energy efficiency programs, and expanded transparency and reporting requirements for energy efficiency assistance programs. The bill also updates eligibility and incentive structures for programs such as the self-generation incentive program and the California Solar Initiative, and maintains existing policies for bioenergy procurement, home insulation assistance, and rate assistance for food banks. The legislation ensures that prudent investments in energy efficiency, renewable energy, and research continue, and that low-income support and other public benefits are preserved.	In committee: Held under submission.	Oppose			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2508

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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 applicant'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 income—such as unemployment insurance, Social Security, veterans' benefits, or state disability insurance—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 applicant'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.	Referred to Committee on Human Services	Sponsored			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB2567
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 days' 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 members' 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 P., D.T., & C.P. (Ayes 5. Noes 0.) (June 17). Re-referred to P., D.T., & C.P.	Watch	Oppose	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

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S.B.239: Crimes: criminal threats.	CA Sen. Jesse Arreguin (D-CA-007)	Senate Bill 239 amends Section 422 of the California Penal Code, which addresses the crime of making criminal threats. Under existing law, it is a crime to willfully threaten to commit an act that would result in death or great bodily injury to another person, with such threats being punishable as either a misdemeanor or felony. The law currently allows courts, when sentencing for a felony conviction, to consider as an aggravating factor if the threat was made against certain public officials, including state constitutional officers, members of the Legislature, judges, or court commissioners. SB 239 expands this list to include elections officials at the city, county, city and county, or public district level, as well as local agency officials as defined by the Government Code. The bill does not introduce new funding requirements, appropriations, or state-mandated local programs, nor does it set new timelines or deadlines. The primary change is the explicit inclusion of local elections officials and local agency officials as protected classes for the purposes of sentencing enhancements in criminal threat cases. This aligns with efforts to increase protections for public officials, particularly those involved in the administration of elections, in response to heightened threats and intimidation in recent years.	From committee with author's amendments. Read second time and amended. Re-referred to Committee on Public Safety	Support	Support	Support	https://leginfo.legislature.ca.gov/faces/billnavclient.xhtml?bill_id=202520260SB239
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.	Referred to Committee on Natural Resources	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

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S.B.534: Dependent children: information related to family.	CA Sen. Steve Padilla (D-CA-018)	Senate Bill 534, as amended, introduces two major legislative changes. First, it amends Section 391 of the Welfare and Institutions Code to enhance the support provided to dependent minors and nonminors under juvenile court jurisdiction. The bill requires county welfare departments to provide, at specified review hearings, not only existing documentation and services (such as social security cards, birth certificates, and assistance with employment and education) but also the last known whereabouts and contact information for the minor's or nonminor's parents and siblings, including phone numbers, addresses, emails, and social media accounts. Importantly, minors and nonminors have the option to decline this information. This change increases the administrative duties of county welfare departments but specifies that no state reimbursement is required unless the state provides annual funding for any cost increases resulting from the 2011 realignment legislation. The bill maintains existing requirements for transitional planning, housing referrals, and support for maintaining relationships with significant individuals, and it clarifies the process and documentation required before terminating dependency jurisdiction over nonminors. Second, the bill (in its earlier, bracketed form) would have established the Green Empowerment Zone for the Salton Sea and Southeastern Desert Valleys, a special economic development district intended to foster equitable economic growth, particularly in clean energy and lithium extraction, in historically disinvested communities of Imperial and Riverside Counties. The empowerment zone would be governed by a diverse board of directors representing local governments, tribal entities, major employers, labor organizations, educational institutions, foundations, community-based organizations, and state and federal agencies. The board would be tasked with identifying and coordinating projects and programs to maximize public and private investment, support workforce development, and ensure that benefits reach underserved populations. The zone would be authorized to receive grants and other funding, contract for services, and develop a regional economic plan. Annual progress reports would be required, beginning January 1, 2027, to track metrics such as job creation, business assistance, workforce training, and the distribution of benefits. The empowerment zone provisions would sunset on January 1, 2035. The bill's amendments to the Welfare and Institutions Code align with the mission of organizations focused on child welfare, foster youth support, and family reunification by strengthening the information and resources provided to youth transitioning out of foster care, with an emphasis on family connections and informed choice. The Green Empowerment Zone provisions, while not currently operative in the amended bill, would have aligned with organizations working on economic justice, environmental equity, and regional development by prioritizing	Re-referred to Committee on Human Services pursuant to Assembly Rule 96.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB534
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 Children'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 entity'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

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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'—defined as all state waters not classified as 'navigable waters' under federal law—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
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 California'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 veterans' 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 veterans' 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 attorney'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 updated standards for clarity and conspicuousness. The bill aligns with the organization's mission to protect service members and veterans from predatory practices, ensure fair access to benefits, and promote transparency in commercial transactions involving this population. By expanding legal definitions, increasing penalties, and enhancing consumer protections, the legislation aims to close loopholes that have allowed exploitation of veterans and service members	Chaptered by Secretary of State. Chapter 1, Statutes of 2026.	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB694

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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
S.B.935: Local agency design-build projects: authorization.	CA Sen. Steven "Steve" Choi (R-CA-037)	Senate Bill No. 935, introduced by Senator Choi and coauthored by several legislators, addresses the authorization for local agencies in California to use the design-build procurement process for public works projects exceeding $1,000,000. Under current law, this authority was set to expire on January 1, 2031. SB 935 repeals the sunset provision, thereby allowing local agencies to continue utilizing the design-build method indefinitely. The design-build process enables agencies to award contracts based on either the lowest bid or best value, and requires certain information from design-build entities to be certified under penalty of perjury. By removing the expiration date, the bill also extends the application of perjury laws related to these certifications, which constitutes a state-mandated local program. However, the bill specifies that no state reimbursement to local agencies or school districts is required, as any costs incurred would result from the creation or modification of a crime or infraction, as outlined in the California Constitution. This legislative change aligns with the interests of organizations focused on public infrastructure, procurement efficiency, and local government autonomy, as it preserves a flexible and potentially cost-effective project delivery method for local agencies.	From committee: Do pass and re-refer to Committee on Appropriations with recommendation: To consent calendar. (Ayes 10. Noes 0.) (June 3). Re-referred to Committee on Appropriations	Support		Sponsor	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB935
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 machine-based systems, including those using artificial intelligence or statistical modeling, that materially impact individuals by assisting or replacing human decision-making in the workplace. Employers are prohibited from using ADS in ways that violate labor, civil rights, or occupational safety laws, from conducting predictive behavior analysis for employment decisions, or from taking adverse actions against workers for exercising their legal rights. The bill also prohibits employers from relying solely on ADS outputs for disciplinary, termination, or deactivation decisions; instead, a human reviewer must independently investigate and corroborate any such decision. Workers are granted the right to request, once every 12 months, a copy of their own data used by an ADS in these decisions, and employers must provide this data in a privacy-protective manner. When an ADS is primarily relied upon for a negative employment action, employers must issue a written postuse notice to the affected worker, detailing the use of ADS, the corroborating evidence, and contact information for further inquiries. The bill includes anti-retaliation protections for workers asserting their rights under these provisions and establishes enforcement mechanisms through the Labor Commissioner and public prosecutors, with civil penalties of $500 per violation. The legislation clarifies that compliance with its notice requirements generally exempts employers from similar state law requirements, except for those subject to the California Consumer Privacy Act. It also exempts employers covered by collective bargaining agreements that explicitly waive these provisions and allows compliance with federal government requirements. The bill applies statewide, including to charter cities, and contains a severability clause to preserve its remaining provisions if any part is invalidated.	From committee with author's amendments. Read second time and amended. Re-referred to Committee on Privacy and Consumer Protection	Opposed- Prior Version	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB947

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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.	From committee: Do pass as amended and re-refer to Committee on Appropriations (Ayes 7. Noes 0.) (June 8).	Support			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB974
S.B.1036: Mitigation Fee Act.	CA Sen. Tim Grayson (D-CA-009)	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 from imposing excessive or duplicative charges that could hinder redevelopment, adaptive reuse, or infill projects, which are often priorities for organizations advocating for sustainable and equitable community development.	Read second time. Ordered to third reading.	Watch-High Priority		Concerns	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB1036

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S.B.1307: False or forged instruments.	CA Sen. Brian Jones (R-CA-040)	Senate Bill 1307 amends Section 115 of the California Penal Code, which addresses the crime of knowingly procuring or offering false or forged instruments for filing, registration, or recording in public offices. The bill maintains that such actions constitute a felony and clarifies that each act of filing or offering a false or forged instrument is a separately punishable offense. It continues to restrict probation for repeat offenders and those whose violations result in financial losses exceeding $100,000, except in unusual cases where justice would be better served by granting probation. The legislation introduces a significant modification by allowing defendants who are granted diversion (such as mental health diversion under Section 1001.36) to stipulate to the voiding of the false or forged instrument. If the defendant fails to complete diversion and criminal proceedings are reinstated, the stipulation to void the instrument cannot be used in any civil or criminal proceeding without the defendant's consent, a provision that requires a two-thirds legislative vote due to its impact on the admissibility of evidence in criminal cases under the California Constitution's Truth in Evidence clause. The bill outlines detailed procedures for the prosecuting agency when seeking to void a false or forged instrument, including requirements for written notice to all interested parties and the recording of a notice of pendency of action within 10 calendar days of filing a criminal complaint or indictment. Interested parties, such as those with recorded interests in affected real property, must be notified and given the opportunity to be heard at a hearing, which cannot be set earlier than 90 days from the motion date. The court is empowered to decline to void the instrument if it determines that the interests of justice or property rights are better protected in a civil proceeding, or if a related quiet title action is pending or resolved. Orders voiding instruments must be recorded in the appropriate county and are considered judgments subject to appeal. No new funding or appropriations are specified in the bill, and it does not create a state-mandated local program. The bill's primary impact is procedural, enhancing due process protections for defendants in diversion programs and for third parties with property interests potentially affected by forged or false instruments. The changes align with principles of fairness and property rights protection, ensuring that the voiding of instruments is subject to judicial oversight and that all interested parties have notice and an opportunity to participate in the process. For organizations focused on criminal justice reform, property rights, or due process, SB 1307 is relevant as it balances the need to address document fraud with safeguards for defendants and third parties. The bill's provisions	From committee with author's amendments. Read second time and amended. Re-referred to Committee on Public Safety	Watch			https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB1307
S.B.1329: Real property tax: valuation: active solar energy system.	CA Sen. Jerry McNerney (D-CA-005)	Senate Bill 1329, as amended, introduces new provisions to the California Revenue and Taxation Code regarding the valuation of active solar energy systems for property tax purposes. The bill establishes that the preferred method for valuing these systems is the 'replacement cost new' minus depreciation and all forms of obsolescence, including external factors such as U.S. duties and tariffs. It specifies that only the tangible components of the solar energy system are to be included in the valuation, explicitly excluding intangible assets and rights such as renewable energy credits, environmental commodities, contracts, and federal or state subsidies. The bill also clarifies that, for systems or portions thereof excluded from the definition of 'newly constructed' under existing law, these should be appraised separately from other property. While the bill expands the responsibilities of local tax officials by requiring uniform valuation methods, it stipulates that the state will not reimburse local agencies for any property tax revenue losses resulting from these changes. However, if the Commission on State Mandates determines that the bill imposes state-mandated costs, reimbursement procedures will follow existing statutory provisions. The legislation is designed to take effect immediately as a tax levy and requires a two-thirds majority in both legislative houses for passage, as it may result in higher taxes for some taxpayers. The bill aligns with efforts to clarify and standardize property tax assessment practices for solar energy systems, which is relevant for organizations focused on renewable energy policy, property taxation, and local government finance.	Referred to Committee on Revenue and Taxation.	Watch-High Priority	Oppose	Oppose	https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB1329

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S.B.1379: County of Riverside: separation of county offices: in-custody reports.	CA Sen. Sabrina Cervantes (D-CA-031)	Senate Bill 1379, as amended, mandates that the County of Riverside separate the offices of sheriff and coroner by July 1, 2027, reversing the current practice of consolidating these roles. The bill requires the county's board of supervisors to move medicolegal death investigation services to the coroner's office and to implement an independent medical examiner model for these services. Only the coroner or a medical examiner will be authorized to sign death certificates and postmortem examination documents, ensuring independence from the sheriff's office. The legislation also establishes new transparency requirements: the county must publish detailed information about in-custody deaths and serious incidents on its website, including incident reports within 24 hours, preliminary reports within 72 hours, and a centralized public database with data on deaths by facility, causes of death, demographics, and medical response times. The bill further requires notification of next of kin within 72 hours of determining the cause of death and mandates reporting to the Department of Justice. These measures are justified by the Legislature due to Riverside County's significantly higher rates of in-custody deaths compared to other counties. If the Commission on State Mandates determines that the bill imposes state-mandated costs, the state will reimburse the county as provided by existing law. The bill aligns with organizational missions focused on government accountability, transparency, and the protection of individuals in custody, particularly regarding independent oversight of deaths and serious incidents in county jails.	From committee with author's amendments. Read second time and amended. Re-referred to Committee on Local Government	Watch-High Priority	Active Watch		https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB1379

FEDERAL
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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 domestic supply chain of seeds, promoting the re-seeding of native or fire-resistant vegetation post-wildfire. A program is established to support priority reforestation and restoration projects on lands	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
H.R. 2887: Protecting Outdoor Concerts Act of 2025	Rep. Raul Ruiz (D-CA-25)	The Protecting Outdoor Concerts Act of 2025 mandates the Federal Aviation Administration (FAA) to issue or revise regulations within one year to establish temporary flight restrictions around outdoor music festivals. These restrictions apply to both manned and unmanned aircraft when deemed necessary to protect people and property, maintain air safety, or prevent aircraft congestion. The regulations will treat outdoor concerts similarly to aerial demonstrations or major sporting events, as per section 91.145 of title 14, Code of Federal Regulations, and will designate restricted airspace akin to the provisions for unmanned aircraft under section 44812 of title 49, United States Code. This legislation aims to enhance safety and efficiency in airspace management during large-scale outdoor events with at least 30,000 attendees per day.	Introduced in House	Pending		https://www.congress.gov/bill/119th-congress/house-bill/2887

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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. To promote state autonomy and federalism, the Act prohibits the Environmental Protection Agency	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

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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. For individual assistance, the Act mandates the creation of a unified, web-based disaster application system and a universal application for direct federal disaster assistance, aiming to	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)	This legislative act directs that approximately 860 acres of federal land in Riverside County, California, currently managed by the Bureau of Land Management, be taken into trust by the United States for the benefit of the Pechanga Band of Indians. Once in trust, the land will become part of the Pechanga Band's reservation and will be managed according to federal laws and regulations governing tribal trust lands. The act stipulates that all existing valid encumbrances, such as liens, rights-of-way, leases, and easements, will remain in effect. The land must be maintained as open space and may only be used for purposes that support the protection, preservation, and maintenance of its archaeological, cultural, and wildlife resources. Construction and maintenance of utilities or structures are permitted only if they align with these conservation goals. Importantly, the act explicitly prohibits any class II or class III gaming activities on the land, as defined by the Indian Gaming Regulatory Act. The legislation also clarifies that it does not alter any existing water rights or service agreements. A map detailing the land in question will be kept on file and made available for public inspection at the Bureau of Land Management. This act aligns with the mission of supporting tribal sovereignty and cultural preservation, while also emphasizing environmental stewardship and the protection of significant resources.	Received in the Senate and Read twice and referred to the Committee on Indian Affairs.	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 Tribe'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 Tribe'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 Property Tax, when the Tribe imposes its own fees or taxes. It also amends land management laws to transfer specified federal lands into trust for the Tribe (over 2,700 acres), notwithstanding provisions	Introduced in House	Support		https://www.congress.gov/bill/119th-congress/house-bill/5935

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2026_RivCo Official Bill List - FED	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	Future Hearing Dates	Source Link
H.R. 7437: BASICS Act	Rep. Kristen McDonald Rivet (D-MI-8)	The Bridges And Safety Infrastructure for Community Success Act (BASICS Act) proposes comprehensive reforms and funding enhancements to federal transportation programs, with a focus on improving bridge infrastructure, highway safety, and transportation planning at both metropolitan and rural levels. The Act amends several sections of Title 23 of the United States Code, introducing new funding formulas and allocations. Notably, it establishes a Strengthening Bridges Formula Program, allocating $5.5 billion annually from 2027 to 2031 for bridge replacement and rehabilitation, with funds distributed to states based on the proportion of bridges in poor condition and a minimum allocation of $45 million per state. The Act also sets aside $150 million annually for regional transportation planning organizations, ensuring direct support for nonmetropolitan and rural planning entities, with a minimum of $300,000 per federally designated regional organization per year and a 100% federal share for eligible activities. The legislation modifies existing apportionment formulas, adjusting the percentage shares for various transportation programs and ensuring that a greater portion of funds is directed toward metropolitan planning and regional transportation planning. It mandates that states consult with local governments, especially in areas with populations under 50,000, before obligating funds, and encourages partnerships with nonpartisan statewide organizations to facilitate this consultation. The Act also requires that, before transferring certain safety funds, states must make them available to local governments and regional planning organizations through a competitive process, ensuring open and fair competition and local input in project selection. A new Strengthening Bridges Formula Program is created, allowing funds to be used for construction, replacement, rehabilitation, preservation, and protection of highway bridges on public roads. The program requires suballocation of funds based on population categories and mandates that project selection in metropolitan and rural areas be coordinated with the appropriate planning organizations or local governments. For off-system bridges owned by local governments or Tribes, the federal share is set at 100%, removing the need for local matching funds.	Introduced in House	Watch		https://www.congress.gov/bill/119th-congress/house-bill/7437
H.R. 8546: Pechanga Band of Indians Water Rights Settlement Technical Amendments Act	Rep. Darrell Issa (R-CA-48)	The Pechanga Band of Indians Water Rights Settlement Technical Amendments Act proposes targeted revisions to the Pechanga Band of Luiseño Mission Indians Water Rights Settlement Act (Public Law 114–322). The bill updates the definition of 'Reservation' to more comprehensively include lands set aside for the Pechanga Band by various executive orders and specific dates, as well as contiguous lands held in trust or placed into trust within the Santa Margarita River Watershed. It also broadens the permissible uses of the Pechanga Water Quality account from solely groundwater desalination activities to any activities addressing water quality issues within the Wolf Valley Basin. The legislation authorizes the Secretary of the Interior to promptly execute necessary amendments to the Pechanga Settlement Agreement to ensure consistency with these statutory changes, as agreed upon by the parties to the agreement. Importantly, the bill clarifies that these amendments do not affect the enforceability date, the satisfaction of conditions precedent, or the validity of existing water rights as of the date of enactment. These technical corrections aim to clarify and expand the scope of the original settlement without altering existing water rights or previously satisfied legal conditions, thereby supporting the Pechanga Band's water management and quality initiatives in alignment with their sovereignty and resource stewardship.	Introduced in House	Watch		https://www.congress.gov/bill/119th-congress/house-bill/8546

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2026_RivCo Official Bill List - FED	Bill Sponsor	Summary	Last Timeline Action	RivCo Stance	Future Hearing Dates	Source Link
S. 4417: Pechanga Band of Indians Water Rights Settlement Technical Amendments Act	Sen. Alex Padilla (D-CA)	The Pechanga Band of Indians Water Rights Settlement Technical Amendments Act proposes targeted revisions to the Pechanga Band of Luiseño Mission Indians Water Rights Settlement Act (Public Law 114–322). The bill updates the definition of 'Reservation' to more comprehensively include lands set aside for the Pechanga Band by various executive orders and specific dates, as well as contiguous lands held in trust or placed into trust within the Santa Margarita River Watershed. It also broadens the permissible uses of the Pechanga Water Quality account from solely groundwater desalination activities to any activities addressing water quality issues within the Wolf Valley Basin. The legislation authorizes the Secretary of the Interior to promptly execute necessary amendments to the Pechanga Settlement Agreement to ensure consistency with these statutory changes, reflecting the consensus of the parties involved. Importantly, the bill clarifies that these amendments do not affect the enforceability date or the satisfaction of conditions precedent as previously determined, nor do they alter any existing water rights as of the date of enactment. These technical corrections aim to ensure the effective implementation of the original settlement while safeguarding existing legal and water rights frameworks.	Introduced in Senate	Watch		https://www.congress.gov/bill/119th-congress/senate-bill/4417

COUNTY OF RIVERSIDE
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June 17, 2026

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

Re: Assembly Bill 1632 (AB 1632) – Johnson: Trespass.
As Amended June 10, 2026--SUPPORT

Dear Assemblymember Johnson:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for AB 1632 and to thank you for your leadership in advancing this important public safety measure.

AB 1632 provides a practical and commonsense improvement to California's trespass enforcement process by eliminating the requirement that property owners notarize requests for peace officer assistance under Penal Code Section 602. As amended on June 10, 2026, the bill instead allows property owners to submit these requests under penalty of perjury, maintaining accountability while significantly reducing administrative barriers that can delay timely law enforcement response.

The County of Riverside encompasses more than 7,300 square miles and includes numerous rural and unincorporated communities with significant numbers of vacant and undeveloped properties. Many of these parcels are owned by absentee landowners who may live elsewhere in California or outside the state. Obtaining a notarized trespass authorization can be difficult, time-consuming, and costly for these property owners, particularly when trespass activity requires a prompt response.

These vacant properties are frequently vulnerable to unauthorized occupation, illegal dumping, vandalism, and other activities that negatively affect neighboring residents and communities. Squatter activity and illegal dumping can create public health and safety concerns, increase fire risk, and result in substantial cleanup costs for both property owners and local governments. By simplifying the authorization process, AB 1632 will make it easier for property owners to work with law enforcement to address these issues before they escalate into more significant community problems.

The June 10 amendments strike an appropriate balance between accessibility and accountability. Requiring a signature under penalty of perjury preserves important safeguards against misuse while eliminating the unnecessary burden of obtaining notarization. In fact, this approach may provide stronger protections against fraudulent filings by placing clear legal responsibility on the individual submitting the authorization.

For Riverside County, this change will help improve the effectiveness of trespass enforcement efforts, particularly in rural areas where vacant properties are common and timely intervention can prevent more serious public safety and nuisance issues. The bill will also reduce administrative burdens on property owners and local agencies while providing a more efficient process for addressing unlawful occupation and related activities.

For these reasons, the County of Riverside supports this measure. 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. Thank you for your leadership on this matter.

Sincerely,

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members, Inland Empire Legislative Delegation

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

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June 17, 2026

The Honorable Blanca Pacheco
Member, California State Assembly
1021 O St, Room 4510
Sacramento, CA 95814

Re: Assembly Bill 1821 (AB 1821) – Pacheco : California Public Records Act: methods of submission, fees, and agency response time
As amended June 10, 2026—SUPPORT

Dear Assemblymember Pacheco:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for AB 1821, your measure that addresses various aspects of how public agencies are able to respond to records requests.

The California Public Records Act (CPRA) is a vital tool that promotes transparency, accountability, and public trust in government. Riverside County is committed to fulfilling its obligations under the CPRA and devotes significant staff and technological resources to ensuring public records are provided promptly and in accordance with the law. As one of California's largest counties, serving more than 2.5 million residents across a geographically diverse region, we recognize the importance of maintaining meaningful public access to government information.

As recently amended, AB 1821 contains a series of practical updates that reflect the realities of modern public records administration. The bill recognizes that public agencies must now process requests involving vast amounts of electronic information, including emails, text messages, databases, and other digital records that require extensive searching, review, and, where necessary, redaction of confidential information. The measure would provide agencies with more clear administrative tools to manage these increasingly complex requests while preserving the public's right to access government records.

We particularly appreciate the bill's clarification of response timelines by measuring statutory deadlines in business days rather than calendar days. This common-sense change aligns legal requirements with actual government operations and ensures agencies have the full number of working days intended by statute to identify, review, and produce responsive records. The bill also recognizes circumstances that can significantly affect an agency's ability to respond, including emergencies, cyber incidents, and requests involving unusually large volumes of records.

AB 1821 further acknowledges the substantial resources required to process certain categories of requests and provides a framework for more appropriately allocating costs in limited

circumstances. At a time when public agencies face growing demands and increasingly constrained resources, these provisions would help ensure that agencies can continue to dedicate staff time and technological resources to fulfilling their transparency obligations without compromising other critical public services.

Riverside County has experienced a dramatic increase in Public Records Act requests in recent years. Countywide requests have grown from approximately 4,800 in 2023 to over 8,400 in 2024, and more than 11,000 requests in 2025. Responding to these requests now requires the involvement of hundreds of employees across numerous departments and more than 66,000 staff hours annually. As government records become increasingly digital and requests become more complex, practical statutory updates are necessary to ensure agencies can continue providing timely and accurate responses.

AB 1821 represents a thoughtful modernization of the CPRA in a manner that preserves public access while providing agencies with reasonable administrative tools to meet their obligations effectively. By aligning statutory requirements with current operational realities, the bill would strengthen the long-term sustainability of public records compliance and help ensure that government transparency remains meaningful and effective for all Californians.

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 and Counsel, Senate Judiciary Committee
Honorable Members, County of Riverside Legislative Delegation

COUNTY OF RIVERSIDE
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June 11, 2026

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

Re: Assembly Bill 2224 (AB 2224) – Hadwick
County Recorders: Fees
As Amended May 18, 2026 – SUPPORT

Dear Chair Durazo:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for AB 2224, Assembly Member Heather Hadwick's measure to update the county recorder fee system – making it more streamlined for consumers and helping recorders recuperate their rising costs of doing business.

This legislation is critical to ensuring the continuity and reliability of essential Recorder services. These services are mandated by law and play a vital role at key moments in residents' lives—from recording property transactions to issuing birth, death, and marriage certificates. Without adequate fee authority, counties would face unavoidable funding shortfalls that could require backfilling through limited discretionary resources, placing additional strain on essential services such as public health and public safety.

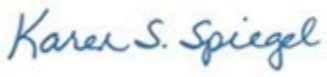
The County of Riverside serves one of the largest and most diverse populations in California, with consistently high demand for timely, accurate, and accessible records. Stable and appropriate fee authority ensures that we can continue to meet these obligations efficiently and without service disruption. It also enables the County to maintain reasonable processing times and avoid delays that would directly impact residents and businesses.

The County has made significant investments in modernizing Recorder operations and expanding public access. In 2025 alone, the Riverside County Assessor-Clerk-Recorder processed nearly 300,000 official records electronically and issued more than 120,000 vital records, many of which were completed without requiring in-person visits. These advancements improve customer service, increase efficiency, and enhance accessibility—but they depend on stable and reliable funding streams.

Importantly, AB 2224 preserves the long-standing principle that Recorder fees are limited to cost recovery and may only be used to support Recorder operations. This ensures fiscal responsibility while allowing counties to sustain and improve the delivery of these essential public services.

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: Honorable Members and Consultants, Senate Local Government Committee
Honorable Members, Inland Empire Legislative Delegation
Honorable Heather Hadwick, Member of the Assembly

COUNTY OF RIVERSIDE

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June 11, 2026

The Honorable Thomas J. Umberg
Chair, Senate Judiciary Committee
1020 N Street, Room 104
Sacramento, CA 95814

Re: Assembly Bill 2529 (AB 2529) – Johnson
Public Entity Employment Claims Verification Requirement
As Amended April 9, 2026 – SUPPORT

Dear Chair Umberg:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for Assembly Bill 2529, by Assembly Member Natasha Johnson, which would require plaintiffs seeking monetary damages against public entities in employment-related actions to attest to the factual allegations supporting their claims.

Riverside County is the fourth-largest county in California, serving more than 2.5 million residents across a geographically vast and diverse region, and is committed to delivering essential public services efficiently and responsibly while ensuring prudent stewardship of taxpayer resources. AB 2529 would advance these objectives by providing a reasonable accountability measure that can help reduce unnecessary litigation costs and preserve public funds for critical community services.

The County fully recognizes that employees who experience unlawful discrimination, harassment, retaliation, or other workplace violations deserve meaningful access to legal remedies and a fair adjudication of their claims. Nothing in AB 2529 diminishes those rights. Rather, the bill seeks to ensure that allegations made in pursuit of monetary damages are verified by the claimant at the outset of litigation, promoting greater accuracy and accountability in the legal process.

The County's Risk Management professionals have identified two recurring issues in employment litigation. First, complaints often contain broad pleadings that assert multiple overlapping causes of action with expansive factual allegations. Second, existing attorney fee provisions can incentivize plaintiffs' counsel to pursue expansive litigation strategies because recovery on even a single claim may result in significant fee awards. As a result, allegations are sometimes broadened or exaggerated beyond the facts that can ultimately be substantiated.

AB 2529 would provide a measured response to this problem by requiring claimants to attest that there is a factual basis for allegations supporting claims for monetary damages. This requirement would encourage greater precision in pleadings, discourage knowingly false or exaggerated claims, and provide parties with a stronger basis for evaluating cases at an earlier

stage. In turn, public entities may be better positioned to focus resources on resolving legitimate disputes while reducing expenditures associated with defending wholly or partially frivolous claims.

For Riverside County, these costs are not abstract. Every dollar spent responding to unsubstantiated litigation claims is a dollar unavailable for public health programs, social services, parks, housing assistance, public safety, road maintenance, and other essential services relied upon by our residents. As one of California's largest county governments, Riverside County must continuously balance growing service demands against finite public resources. Reasonable measures that help reduce avoidable litigation costs allow local governments to direct more resources toward serving their communities.

Importantly, AB 2529 strikes an appropriate balance. The bill does not prevent employees from bringing valid claims, impose new substantive legal barriers, or limit access to the courts. Instead, it establishes a commonsense verification requirement when public funds are being sought through litigation. This modest reform promotes accountability while preserving full access to justice for individuals with legitimate claims.

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 Spiegel
Chair, Riverside County Board of Supervisors

cc: Members and Counsel, Senate Judiciary Committee
Honorable Natasha Johnson, Member of the Assembly
Honorable Members, Inland Empire Legislative Delegation

COUNTY OF RIVERSIDE
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June 11, 2026

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

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

Dear Chair Bryan:

On behalf of the County of Riverside, I write to express the County's strong support for **SB 299**, Senator Christopher Cabaldon's measure that 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: Honorable Christopher Cabaldon, Member of the Senate
Members and Consultants, Assembly Natural Resources Committee
Members of the Inland Empire Legislative Delegation

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April 8, 2026

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

RE: Assembly Bill 2567 (AB 2567) – Rodriguez
CalWORKs Immediate Need and Homeless Assistance Reform
As amended 3/26/2026 – SUPPORT

Dear Chair Becker:

On behalf of the County of Riverside Board of Supervisors, I am pleased to express our strong support for AB 2567, by Assembly Member Celeste Rodriguez, 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.

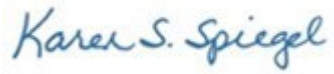
AB 2567 provides a thoughtful and targeted solution by allowing counties to determine apparent eligibility to CalWORKs, which is required to be eligible to temporary HA and IN benefits, without first requiring applicants to complete the UAI application process. Importantly, the bill maintains key program 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.

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: Honorable Members and Consultants, Senate Human Services Committee
Honorable Celeste Rodriguez, Member of the Assembly
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

June 8, 2026

The Honorable Tim Grayson, Chair
Senate Banking and Financial Institutions Committee
1021 O Street, Suite 7250
Sacramento, CA 95814

Re: Assembly Bill 871 (AB 871) – Stefani
Mandated reporters of suspected financial abuse of an elder or dependent adult
AS AMENDED JANUARY 16, 2026 – SUPPORT

Dear Chair Grayson:

On behalf of the County of Riverside Board of Supervisors, I write to express our support of AB 871 by Assembly Member Stefani, which expands requirements for mandated reporters working at financial institutions.

California is home to nearly 6 million seniors – more than any other state in the nation. The state's population of adults aged 65 and older is projected to reach 25 percent of the population, or 8.6 million Californians, by 2030. Each year, millions of older adults fall victim to telephone and internet-based fraud and financial scams. County Adult Protective Service (APS) agencies are on the front lines of combatting elder financial abuse and exploitation, of which 36 percent of APS reports are due to financial abuse.

The FBI reports that over $3 billion was lost in elder fraud scams in 2023 nationwide. This only covers reported crime, so the actual losses may be much higher. Since 2000, the FBI's Internet Crime Complaint Center (IC3) has received complaints about internet-facilitated crimes, including online fraud and other cybercrimes. The IC3 provides the public with a convenient reporting system to submit information to the FBI concerning suspected internet-facilitated crime. Information gathered by the system is analyzed and used for investigative and intelligence purposes, as well as public awareness, to help combat future financial exploitation.

Financial institutions are uniquely positioned to help prevent financial loss due to offering services and products helping consumers manage their finances. Banks and other financial institutions are already required to report suspected abuse to law enforcement, but many only report to their local police department or possibly adult protective services. Reporting to local authorities is essential, but additional reporting to federal agencies can provide investigative support to local agencies. The sooner the abuse is reported to federal authorities, the more likely the stolen funds will be recovered. Reporting within the first 24-48 hours is critical to intervening and recovering stolen money, especially through cyber scams.

AB 871 requires financial institutions to provide annual training to mandated reporters on how to internally escalate suspected financial abuse and report it to both local and federal authorities, including the FBI's Internet Crime Complaint Center and the Federal Trade Commission (FTC). AB 871 also requires a report to the FBI's IC3 within two working days when suspected financial abuse is reported, and if suspected abuse is discovered within 48 hours of a transaction, the financial institution must share information on reporting mechanisms with the impacted elder or dependent adult within 24 to 48 hours. Expanding reports to federal authorities and improving coordination between financial institutions, law enforcement, and federal agencies will aid local law enforcement in their investigations and improve the chance of recovering stolen funds.

In Riverside County, we average 20,000 APS cases annually, with approximately 21% percent of those cases due to suspected financial abuse. The passage of this bill would provide additional support in finding and stopping criminals, clarify for financial institutions about how to most effectively report abuse, and allow reports to be made quickly, thus increasing the chance of recovering stolen funds.

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: The Honorable Catherine Stefani
Honorable Members, Senate Banking and Financial Institutions Committee
County Welfare Directors Association (CWDA)

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

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

June 4, 2026

The Honorable Steven Choi
Member of the Senate
1021 O Street, Suite 2030
Sacramento, CA 95814

Re: Senate Bill 935 (SB 935) - Choi
Local Agency Design-Build Authority
As Introduced - SUPPORT

Dear Senator Choi:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for Senate Bill 935 (Choi), your measure that would permanently authorize local agencies to utilize the design-build procurement process for public works projects by removing the existing January 1, 2031, sunset date.

Riverside County is the fourth-largest county in California, serving more than 2.5 million residents across a geographically diverse region spanning more than 7,300 square miles. Riverside County is committed to delivering critical public infrastructure and public services efficiently, responsibly, and cost-effectively. SB 935 advances these goals by preserving a proven project delivery method that enables local governments to complete complex public works projects more efficiently while maintaining accountability and stewardship of public resources.

The design-build procurement process has been an invaluable tool for Riverside County. By integrating design and construction responsibilities under a single contract, design-build creates a streamlined project delivery structure that enhances collaboration, improves accountability, reduces administrative burdens, and accelerates project completion. Based on the County's experience, design-build has consistently improved project performance across schedule management, cost control, and risk mitigation.

The County's Facilities Management Department has successfully utilized design-build procurement on several significant public projects. For example, Riverside County delivered the $20 million Emergency Management Department Emergency Operations Center Renovation in Riverside through the design-build process. The project involved the renovation of approximately 17,000 square feet of facility space and associated site improvements and was completed on time and within budget. Similarly, the County's $10.1 million Parking Structure project in Indio, an 832-stall multi-level public parking facility, was also completed on time and within budget utilizing the design-build model.

These successes are not isolated examples. Riverside County has found that design-build procurement significantly shortens project delivery timelines by allowing design and construction activities to proceed in a coordinated and overlapping manner. In many instances, construction activities can begin once permits are secured rather than waiting for every aspect of the design process to be completed. This integrated approach enables local agencies to deliver needed infrastructure to the public more quickly and efficiently.

Additionally, Riverside County has experienced fewer change orders and less costly rework when utilizing design-build procurement. Potential issues are often identified and resolved earlier in the project lifecycle, allowing contingencies to be addressed proactively before they become expensive construction challenges. When unforeseen conditions arise, they can frequently be resolved more quickly and with less impact on project budgets and schedules than under traditional delivery methods.

As local governments throughout California continue to face increasing infrastructure demands and fiscal constraints, maintaining access to flexible and effective procurement tools is critical. SB 935 does not create a new procurement authority; rather, it preserves an existing authority that has demonstrated its value over many years for counties, cities, and other local agencies across the state. Eliminating the sunset date will provide certainty for long-term capital planning and allow local governments to continue selecting the procurement method that best serves their communities.

For these reasons, the County of Riverside supports this measure. 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, Riverside County Board of Supervisors

cc: Inland Empire Legislative Delegation

COUNTY OF RIVERSIDE

BOARD OF SUPERVISORS

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June 9, 2026

The Honorable Patrick Ahrens
California State Assembly
1021 O Street, Suite 6110
Sacramento, CA 95814

RE: Assembly Bill 1961 (AB 1961) – Ahrens
Workplace Violence Restraining Orders
As Amended April 16, 2026 – SUPPORT

Dear Assembly Member Ahrens:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for AB 1961, your measure that would strengthen employee protections by allowing employers to seek workplace violence restraining orders in situations where credible threats are directed at a workplace, worksite, or group of employees rather than a specifically identified individual employee.

Riverside County is the fourth-largest county in California, serving more than 2.5 million residents across a geographically diverse region. County employees work daily in public-facing environments providing critical services, including behavioral health care, social services, public health programs, code enforcement, animal services, public assistance programs, and other essential government functions. While the vast majority of interactions with the public are positive and productive, County employees occasionally encounter threatening behavior that creates legitimate safety concerns for staff and the public.

Under existing law, employers seeking a workplace violence restraining order are generally required to identify a specific employee who has been threatened. However, threats are not always directed at a particular individual. In some cases, threatening statements are aimed broadly at a workplace location, department, or group of employees. When that occurs, employers may face challenges obtaining appropriate legal protections, despite the existence of a credible threat affecting multiple employees.

Riverside County has experienced situations that illustrate this concern. For example, an individual interacting with County staff stated, "I will get a bomb and blow the office up." In another incident, a caller threatened that if any Animal Control Officer returned to a location, "you'll see what happens." In both cases, the threats were directed toward a workplace or group of employees rather than a specifically identified individual. Yet the potential safety risks to County employees and members of the public were no less serious.

AB 1961 would provide employers with an important and practical tool to address these situations. By allowing protective orders to be sought when threats are directed at a workplace or employee group, the bill better reflects the realities of modern workplace violence prevention. The measure would help employers act proactively to protect employees, maintain safe public facilities, and reduce the risk of violence before an incident occurs.

For counties, this authority is particularly important because many government offices serve vulnerable populations and members of the public who may be experiencing significant personal, financial, or emotional stress. Ensuring that employers have access to appropriate legal remedies when credible threats arise is essential to protecting both employees and the residents who rely on County services.

For these reasons, the County of Riverside supports this measure. Thank you for your leadership on this important measure. 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

Karen Spiegel
Chair, Riverside County Board of Supervisors

cc: Honorable Tom Umberg, Chair, Senate Judiciary Committee
Members and Counsel, Senate Judiciary Committee
Inland Empire Legislative Delegation

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

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May 28, 2026

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

Re: Assembly Bill 1337 (AB 1337) – WARD
Information Practices Act of 1977
As amended May 23, 2026 – OPPOSE

Dear Representative Cabaldon:

On behalf of the County of Riverside Board of Supervisors, I write to express our opposition for AB 1337 (Ward), which would amend the Information Practices Act (IPA) and apply its provisions to all counties. While the County strongly supports protecting personal privacy and safeguarding sensitive information, we are deeply concerned that AB 1337 would create significant barriers to integrated service delivery models that improve outcomes for vulnerable residents and strengthen government efficiency.

Riverside County joins statewide concerns raised by the California State Association of Counties (CSAC) and other local government partners regarding the broad operational, fiscal, and legal implications of this legislation. However, Riverside County faces an additional and particularly significant concern because of the direct threat this bill poses to our RivCoOne Integrated Services Delivery initiative.

RivCoOne represents a transformational effort to modernize the County's approach to serving residents by creating a coordinated "no wrong door" system for accessing public services. Through RivCoOne, the County seeks to move beyond fragmented service delivery and create a more efficient and person-centered approach where residents can more easily access assistance across programs and departments. Rather than requiring individuals and families to repeatedly navigate separate systems and provide the same information multiple times, RivCoOne aims to connect services in a way that reduces barriers and improves outcomes.

This integrated approach is particularly important for residents facing complex challenges that often span multiple systems. Families experiencing homelessness may also require behavioral health services, public assistance, workforce development support, and healthcare access. Older adults may need transportation assistance, social services, healthcare coordination, and

housing support. Individuals with behavioral health needs frequently interact with multiple County departments and community partners. RivCoOne is designed to ensure that these individuals receive coordinated support rather than navigating disconnected systems independently.

AB 1337 threatens these efforts by imposing restrictive standards governing how agencies use, transfer, and disclose information. Under the bill, information could only be used for the original purpose for which it was collected and could only be transferred if it both satisfies constitutional and statutory duties and "furthers the purpose" for which the information was originally obtained. This standard creates ambiguity and uncertainty that could significantly impair integrated service models.

For Riverside County, this means that data-sharing practices critical to RivCoOne could become difficult or impossible to maintain. Instead of enabling seamless service delivery, departments may be forced to collect the same information repeatedly from residents, creating duplicative processes and additional administrative burdens. Individuals seeking help may once again find themselves navigating multiple systems and retelling their circumstances numerous times before receiving assistance.

Riverside County serves more than 2.5 million residents across approximately 7,300 square miles and administers programs supporting public health, behavioral health, housing, workforce development, social services, public safety, and emergency assistance. Coordinated service delivery is particularly important in a county of our size and geographic diversity.

The County has invested considerable resources to improve coordination and break down barriers between systems that historically operated independently. AB 1337 risks reversing that progress and creating new barriers for the very populations who most rely on efficient access to government services.

We are also concerned by the bill's broader impacts on County operations. The legislation creates substantial uncertainty regarding data reporting requirements, information-sharing obligations tied to federal funding programs, and routine agency functions that support accountability and transparency. It may require extensive modifications to existing systems, legal agreements, staff training, and operating procedures while exposing local agencies and employees to significant new legal liabilities.

Additionally, the implementation timeline does not reflect the scale of operational changes that would be required. Programs and systems developed over many years—often with significant state and federal investments—cannot be rapidly redesigned without substantial costs and potential disruptions to service delivery.

Riverside County strongly supports protecting personal privacy and maintaining public trust in government systems. However, we believe these objectives can and should be accomplished without undermining integrated service delivery models that help residents access needed assistance more effectively and efficiently. For these reasons, the County of Riverside respectfully urges your "NO" vote on AB 1337.

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

Sincerely,

Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: The Honorable Chris Ward
Members and Consultants, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Honorable Members, Inland Empire Legislative Delegation

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

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May 12, 2026

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

RE: Assembly Bill 1883 (AB1883) – Bryan
Workplace surveillance tools
As Amended April 13, 2026 – OPPOSE

Dear Representative Wicks:

On behalf of the County of Riverside Board of Supervisors, I write to express our opposition to AB 1883 (Bryan), which would significantly restrict the use of workplace tools that are essential to the safe and effective operation of public agencies. While we recognize the importance of protecting worker privacy and safeguarding labor rights, we are concerned that AB 1883 is overly broad and could unintentionally hinder the County's ability to carry out core government functions, ensure workplace safety, and responsibly steward public resources.

The County of Riverside is aligned with the concerns raised by statewide local government partners, including the California State Association of Counties and Urban Counties of California, whose coalition letter outlines the significant operational, legal, and fiscal challenges posed by this measure. As one of the largest counties in California, serving more than 2.5 million residents across a geographically diverse region, Riverside County relies on a wide range of tools—many of which could fall under the bill's expansive definition of "workplace surveillance tools"—to support public safety, service delivery, and internal operations.

AB 1883 would impose sweeping restrictions on tools that are routine and necessary for local government operations. These tools include security cameras, badge access systems, GPS tracking for public safety and fleet management, and digital workplace platforms used for communication and coordination. These technologies are not used to undermine employee rights, but rather to protect employees and the public, ensure accountability, and enable efficient delivery of services.

We are particularly concerned that the bill's broad definitions and prohibitions could inadvertently restrict the use of routine safety and operational tools. For example, technologies that passively collect data—such as access badges or communication systems—could be interpreted as prohibited if they are deemed to "identify" or "infer" information about protected activity. This ambiguity creates uncertainty for public agencies and risks limiting tools that are critical for maintaining safe workplaces, responding to emergencies, and delivering essential services.

In addition, AB 1883 raises concerns regarding its application to public agencies. Existing law already provides robust protections for public employees, including the right to organize and protections against retaliation or discrimination. These protections are well-established in statute and supported by enforcement mechanisms. Imposing additional, overlapping restrictions through AB 1883 is unnecessary and could create conflicts with existing legal frameworks.

The bill also exposes public agencies to significant litigation risk. By authorizing civil actions for violations of a broadly defined and potentially ambiguous statute, AB 1883 could subject counties to substantial penalties, including per-employee fines, attorney's fees, and damages. For large public agencies, even a single alleged violation could result in significant financial liability, diverting resources away from essential public services such as public health, public safety, and infrastructure.

AB 1883 could also impede the ability of public agencies to investigate fraud, waste, and abuse, as well as respond effectively to workplace safety threats. These functions are fundamental to good governance and the responsible use of taxpayer resources.

The County of Riverside supports policies that protect employee rights and promote transparency and accountability. However, we believe AB 1883, as currently drafted, goes too far and creates unintended consequences that could compromise public safety, operational effectiveness, and fiscal stability.

For these reasons, the County of Riverside opposes this measure. 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 Delegation

COUNTY OF RIVERSIDE
BOARD OF SUPERVISORS

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

May 12, 2026

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

RE: Assembly Bill 2508 (AB 2508) – Hoover
Public Utilities Public Purpose Programs Fund
As Amended March 26, 2026 – OPPOSE

Dear Representative Wicks:

On behalf of the County of Riverside Board of Supervisors, I write to express our opposition to AB 2508 (Hoover), which would eliminate the current funding structure for Public Purpose Programs, including energy efficiency programs, and instead shift funding to more volatile sources.

Energy efficiency programs are a critical tool for managing energy demand, improving affordability, and supporting local government operations. As reflected in broader statewide concerns, stable and predictable funding is essential to ensuring these programs continue to deliver cost savings, reduce strain on the energy grid, and support economic activity.

At the local level, Riverside County has directly benefited from programs administered through the Inland Regional Energy Network (I-REN), which would be jeopardized by the funding instability proposed in AB 2508. These programs provide measurable value to the County and our residents, including:

- Placement of three I-REN Energy Fellows supporting workforce development, facilities management, and education initiatives with 35 fellows deployed across public agencies countywide
- A $3 million investment in workforce development boards to build clean energy career pathways
- Development of a Countywide Energy Resilience Roadmap, identifying over $19 million in annual County energy expenditures and strategies to reduce costs with over $1.5 million in energy efficiency incentives for public agencies across Riverside County.

These programs not only reduce long-term energy costs for taxpayers but also strengthen local workforce development, improve facility efficiency, and enhance energy resilience across public infrastructure. AB 2508 would undermine these benefits by introducing uncertainty into the funding stream that supports these programs.

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

Sincerely,

Karen S. Spiegel

County of Riverside

cc: Honorable Assemblymember Josh Hoover
Honorable Members, 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

April 8, 2026

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

RE: Assembly Bill 2567 (AB 2567) – Rodriguez
CalWORKs Immediate Need and Homeless Assistance Reform
As amended 3/26/2026 – SUPPORT

Dear Chair Becker:

On behalf of the County of Riverside Board of Supervisors, I am pleased to express our strong support for AB 2567, by Assembly Member Celeste Rodriguez, 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.

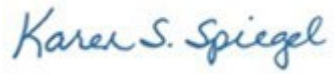
AB 2567 provides a thoughtful and targeted solution by allowing counties to determine apparent eligibility to CalWORKs, which is required to be eligible to temporary HA and IN benefits, without first requiring applicants to complete the UAI application process. Importantly, the bill maintains key program 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.

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: Honorable Members and Consultants, Senate Human Services Committee
Honorable Celeste Rodriguez, Member of the Assembly
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

April 16, 2026

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

Re: Senate Bill 974 (SB 974) Seyarto
Property Taxation: Change in Ownership: Generational Transfers: Special Needs Trusts
As Amended March 25, 2026 – SUPPORT

Dear Senator Seyarto:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for SB 974, which strengthens and clarifies the application of Proposition 19 to family homes held in Special Needs Trusts (SNTs) for the benefit of a severely disabled child.

Families across Riverside County rely on Special Needs Trusts as a critical planning tool to ensure long-term care, financial stability, and the preservation of essential public benefits for individuals with significant disabilities. In many cases, a parent transfers the family home into an SNT to responsibly provide for their child's future. SB 974 appropriately recognizes this reality and clarifies that the use of an SNT does not, by itself, disqualify a family home from eligibility under Proposition 19's intergenerational transfer provisions.

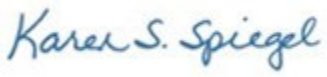
This clarification is essential to ensuring equitable and consistent treatment between property held directly by a parent and property transferred into an SNT for the benefit of a severely disabled child. Without this statutory clarity, families may face uncertainty or inconsistent outcomes that do not reflect voter intent. SB 974 promotes fairness while maintaining the integrity of California's property tax framework.

From a county administration perspective, the bill also provides important clarity and guidance that will support consistent implementation across jurisdictions. By narrowing its focus to a specific and well-defined issue, SB 974 addresses a meaningful gap in current law without creating broader unintended consequences.

The County of Riverside appreciates the thoughtful work undertaken by your office in developing this measure and ensuring it reflects both policy intent and practical application.
For these reasons, the County of Riverside respectfully supports SB 974 and thanks you for your leadership on this important issue impacting families planning for the long-term care of children with disabilities.

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: 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

May 12, 2026

The Honorable Ken Calvert
Rayburn House Office Building
50 Independence Avenue, SW, Room 2205
Washington, DC 20515

Re: House Resolution 7437 (HR 7437) – McDonald Rivet
Bridges And Safety Infrastructure for Community Success Act (BASICS Act)
As introduced February 9, 2026 - SUPPORT

Dear Representative Calvert:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437). This bipartisan legislation would make important improvements to federal transportation programs and help ensure that counties like Riverside have more reliable access to formula funding for critical infrastructure projects.

Counties are essential partners in our nation's surface transportation system, owning 44 percent of public road miles and 38 percent of bridges nationwide. In Riverside County, we are responsible for more than 2,200 miles of public roads and over 100 bridges across approximately 7,300 square miles of diverse terrain. These assets are integral to connecting our communities, supporting economic activity, and ensuring safe and efficient movement of people and goods throughout the region.

Despite these responsibilities, counties face ongoing challenges in accessing federal formula transportation funding, which comprises the majority of federal infrastructure investment. Local governments collectively receive a relatively small share of these funds, even as they maintain a significant portion of the system. This imbalance, combined with rising construction costs, workforce constraints, and fiscal limitations, contributes to disparities in infrastructure conditions. Nationally, locally owned bridges are significantly more likely to be classified in poor condition compared to state-owned infrastructure, underscoring the need for more equitable access to funding.

While the Bipartisan Infrastructure Law made historic investments in transportation, much of that funding flowed through existing formula programs that did not consistently reach county-led projects. As Congress considers the next surface transportation reauthorization, it is critical to

ensure that counties have dependable access to these resources to maintain and improve the infrastructure we own and operate.

The BASICS Act offers a strong and practical framework to address these challenges. The bill would expand access to formula funding and improve program delivery in ways that benefit counties and the communities we serve. Specifically, the legislation would:

- Strengthen and expand the Surface Transportation Block Grant program, providing flexible funding that can be used for locally prioritized projects.
- Increase access to formula funding for bridges and safety improvements on county-owned infrastructure.
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These provisions are particularly important for Riverside County as we work to maintain a large and interconnected transportation network that supports both urban and rural communities. Reliable access to formula funding will allow us to better plan, prioritize, and deliver projects that improve safety, reduce congestion, and support economic growth.

Counties and states are partners in delivering infrastructure, and a balanced approach that preserves state funding while improving local access will strengthen the overall transportation system. The BASICS Act reflects this collaborative approach and provides a path forward for more equitable and effective investment.

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, 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

May 12, 2026

The Honorable Darrell Issa
Rayburn House Office Building
50 Independence Avenue, SW, Room 2108
Washington, DC 20515

Re: House Resolution 7437 (HR 7437) – McDonald Rivet
Bridges And Safety Infrastructure for Community Success Act (BASICS Act)
As introduced February 9, 2026 - SUPPORT

Dear Representative Issa:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437). This bipartisan legislation would make important improvements to federal transportation programs and help ensure that counties like Riverside have more reliable access to formula funding for critical infrastructure projects.

Counties are essential partners in our nation's surface transportation system, owning 44 percent of public road miles and 38 percent of bridges nationwide. In Riverside County, we are responsible for more than 2,200 miles of public roads and over 100 bridges across approximately 7,300 square miles of diverse terrain. These assets are integral to connecting our communities, supporting economic activity, and ensuring safe and efficient movement of people and goods throughout the region.

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While the Bipartisan Infrastructure Law made historic investments in transportation, much of that funding flowed through existing formula programs that did not consistently reach county-led projects. As Congress considers the next surface transportation reauthorization, it is critical to

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The BASICS Act offers a strong and practical framework to address these challenges. The bill would expand access to formula funding and improve program delivery in ways that benefit counties and the communities we serve. Specifically, the legislation would:

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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

May 12, 2026

The Honorable Young Kim
Rayburn House Office Building
50 Independence Avenue, SW, Room 2439
Washington, DC 20515

Re: House Resolution 7437 (HR 7437) – McDonald Rivet
Bridges And Safety Infrastructure for Community Success Act (BASICS Act)
As introduced February 9, 2026 - SUPPORT

Dear Representative Kim:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437). This bipartisan legislation would make important improvements to federal transportation programs and help ensure that counties like Riverside have more reliable access to formula funding for critical infrastructure projects.

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Sincerely,

Karen S. Spiegel

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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

May 12, 2026

The Honorable Alex Padilla
Hart Senate Office Building
120 Constitution Avenue, NE, Room 331
Washington, DC 20510

Re: House Resolution 7437 (HR 7437) – McDonald Rivet
Bridges And Safety Infrastructure for Community Success Act (BASICS Act)
As introduced February 9, 2026 - SUPPORT

Dear Senator Padilla:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437). This bipartisan legislation would make important improvements to federal transportation programs and help ensure that counties like Riverside have more reliable access to formula funding for critical infrastructure projects.

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Sincerely,

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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

May 12, 2026

The Honorable Raul Ruiz
Rayburn House Office Building
50 Independence Avenue, SW, Room 2342
Washington, DC 20515

Re: House Resolution 7437 (HR 7437) – McDonald Rivet
Bridges And Safety Infrastructure for Community Success Act (BASICS Act)
As introduced February 9, 2026 - SUPPORT

Dear Representative Ruiz:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437). This bipartisan legislation would make important improvements to federal transportation programs and help ensure that counties like Riverside have more reliable access to formula funding for critical infrastructure projects.

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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

May 12, 2026

The Honorable Adam Schiff
Hart Senate Office Building
120 Constitution Avenue, NE, Room 112
Washington, DC 20510

Re: House Resolution 7437 (HR 7437) – McDonald Rivet
Bridges And Safety Infrastructure for Community Success Act (BASICS Act)
As introduced February 9, 2026 - SUPPORT

Dear Senator Schiff:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437). This bipartisan legislation would make important improvements to federal transportation programs and help ensure that counties like Riverside have more reliable access to formula funding for critical infrastructure projects.

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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

May 12, 2026

The Honorable Mark Takano
Rayburn House Office Building
50 Independence Avenue, SW, Room 2078
Washington, DC 20515

Re: House Resolution 7437 (HR 7437) – McDonald Rivet
Bridges And Safety Infrastructure for Community Success Act (BASICS Act)
As introduced February 9, 2026 - SUPPORT

Dear Representative Takano:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437). This bipartisan legislation would make important improvements to federal transportation programs and help ensure that counties like Riverside have more reliable access to formula funding for critical infrastructure projects.

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Karen S. Spiegel

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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

May 12, 2026

The Honorable Norma Torres
Rayburn House Office Building
50 Independence Avenue, SW, Room 2227
Washington, DC 20515

Re: House Resolution 7437 (HR 7437) – McDonald Rivet
Bridges And Safety Infrastructure for Community Success Act (BASICS Act)
As introduced February 9, 2026 - SUPPORT

Dear Representative Torres:

On behalf of the County of Riverside Board of Supervisors, I write to express our support for the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437). This bipartisan legislation would make important improvements to federal transportation programs and help ensure that counties like Riverside have more reliable access to formula funding for critical infrastructure projects.

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Supervisor Karen Spiegel
Chair, County of Riverside Board of Supervisors

cc: Honorable Members, County of Riverside Legislative Delegation

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
6/17/2026	Meeting	Congressional Delegation for a Roundtable Discussion on Housing Solutions		Rep. Norma Torres (D-CA-35)
5/28/2026	Call	Creighton Krauss (Asm. Gonzalez)	AB 1175	CA Assemb. Jeff Gonzalez (R-CA-036)
5/22/2026	Call	Julia Reyes		CA Sen. Sabrina Cervantes (D-CA-031)
5/22/2026	Call	Josh Tooker, Chief Consultant CA Assembly Committee on Environmental Safety and Toxic Materials (California State Assembly)		
5/21/2026	Meeting	CSAC Lobby Day		Asm. Natasha Johnson
5/21/2026	Meeting	CSAC Lobby Day		Asm. Leticia Castillo
5/21/2026	Meeting	CSAC Lobby Day		Senator Rosilicie Ochoa Bogh
5/15/2026	Meeting	UCC Legislative and Budget Forum on May 15 from 11:00 to noon.		Governor Gavin Newsom (CA)
5/14/2026	Lobby Day- DC	HWS-Advocacy Meetings with Congress, the Senate, and the Department of Labor – Washington, D.C., May 10–14.		Sen. Alex Padilla (D-CA), Sen. Adam Schiff (D-CA)
5/13/2026	Lobby Day- DC	HWS-Advocacy Meetings with Congress, the Senate, and the Department of Labor – Washington, D.C., May 10–14.		Rep. Ken Calvert (R-CA-41), Rep. Darrell Issa (R-CA-48), Rep. Mark Takano (D-CA-39)
5/12/2026	Lobby Day- DC	HWS-Advocacy Meetings with Congress, the Senate, and the Department of Labor – Washington, D.C., May 10–14.		Rep. Young Kim (R-CA-40), Rep. Raul Ruiz (D-CA-25), Rep. Norma Torres (D-CA-35)
5/12/2026	Lobby Day- SAC	Housing and Workforce Solutions and Community Action Partnership in Sacramento for CALCAPA Advocacy Day [May 12-14, 2026]. Attendees: Emma Perez-Singh, Acting Executive Director.		Governor Gavin Newsom (CA)
5/11/2026	Lobby Day- SAC	Housing and Workforce Solutions in Washington, DC for the Workforce Development Board Advocacy meetings with Congressional, Senate, Department of Labor Representatives [May 11-13, 2026]. Attendees: Angel Sanchez Jr., Workforce Development Board Chair.		Governor Gavin Newsom (CA)
5/10/2026	Lobby Day- SAC	Department of Child Support Services in Sacramento for Building Consensus [May 10-13, 2026]. Attendees: Jennifer Solorio and Nicole Curiel. Training on equity principles, which build skills in working with stakeholders.		Governor Gavin Newsom (CA)
5/6/2026	Lobby Day- SAC			CA Sen. Sabrina Cervantes (D-CA-031)
5/6/2026	Lobby Day- SAC			County Executive James Williams (Santa Clara County, CA)
5/6/2026	Lobby Day- SAC			CA Sen. Rosilicie Ochoa Bogh (R-CA-019)
5/6/2026	Lobby Day- SAC			CA Sen. Maria Durazo (D-CA-026)
5/6/2026	Lobby Day- SAC			CA Assemb. Corey Jackson (D-CA-060)
5/6/2026	Lobby Day- SAC	Senate Budget HHS Subcommittee Chair Caroline Menjivar, Budget Consultant Kimberly Fuentes. Attendees: Supervisor Jose Medina, Dr. Benjamin Waterman, COO, Olive View-UCLA Medical Center (OVMC), County of Los Angeles, Dr. Veronica Kelley, Health Care Agency Director, County of Orange, Bob Giroux, LHGK, Kelly Brooks, HBE		CA Sen. Caroline Menjivar (D-CA-020)
5/6/2026	Lobby Day- SAC			CA Sen. Steve Padilla (D-CA-018)

Outreach and Communications Report

Date	Interaction Type	Details	Associated Bills	Associated Offices
5/5/2026	Lobby Day- SAC	Office on Aging in Sacramento for C4A Strategic Planning and Advocacy Day [May 5-7, 2026]. Advocacy Day [May 7, 2026]. Attendee: Mia Attruia, Office on Aging Regional Manager.		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)
4/22/2026	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

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

June 10, 2026

The Honorable Tim Grayson
Chair, Senate Banking and Financial Institutions Committee
1020 N Street, Room 522
Sacramento, CA 95814

RE: AB 871 (Stefani) Mandated reporters of suspected financial abuse of an elder or dependent adult
As Amended January 16, 2026 – SUPPORT
Set for Hearing in Senate Banking and Financial Institutions Committee on June 17, 2026

Dear Senator Grayson:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Assembly Bill 871 by Assembly Member Catherine Stefani. This measure will improve prevention of elder and dependent adult financial abuse by expanding requirements for mandated reporters at financial institutions.

Each year, millions of vulnerable adults fall victim to telephone and internet-based fraud and financial scams. County Adult Protective Service (APS) agencies are on the front lines of combatting elder and dependent adult financial abuse and exploitation, of which 36 percent of APS reports are due to financial abuse. Although financial institutions are already required to report suspected abuse, many only report to their local police department or APS agency, making cross-jurisdiction criminal investigations difficult.

AB 871 requires financial institutions to provide annual training to mandated reporters on how to internally escalate suspected financial abuse and report it to both local and federal authorities, including the FBI's Internet Crime Complaint Center (IC3) and the Federal Trade Commission (FTC). AB 871 also requires a report to the FBI's IC3 within two working days when suspected financial abuse is reported, and if suspected abuse is discovered within 48 hours of a transaction, the financial institution must share information on reporting mechanisms with the impacted elder or dependent adult within 24 to 48 hours. Expanding reports to federal authorities and improving coordination between financial institutions, law

CSAC Officers

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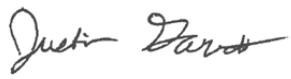
enforcement, and federal agencies will aid local law enforcement in their investigations and improve the chance to recover stolen funds.

For these reasons, CSAC supports AB 871. 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.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Catherine Stefani, Member, California State Assembly
Honorable Members and Consultants, Senate Banking & Financial Institutions Committee
Spencer Winkle, Consultant, Senate Republican Caucus

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 May 13, 2026. 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 redefine the compensation cap established under PEPRA for Miscellaneous and Safety PEPRA members. The new proposed PEPRA cap is increased to the amount specified in Section 430(b) of Title 42 of the United States Code (i.e. $184,500 for those whose service is included in the federal system and $249,075 for those whose service is not included in the federal system for 2026). 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, 2027. All PEPRA benefits earned from January 1, 2013 through December 31, 2026 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 some PEPRA members by varying degrees. The increase to the present value of future benefits (PVB) is estimated at $4.8 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 $233 million for all State, Schools, and Local Agency plans. As a result, this $4.8 billion increase to the PVB would be funded through a combination of increased annual normal cost contributions for future service over the remaining future working lifetime of the employees who were active as of June 30, 2024, and increased amortization payments to pay down the resulting increase in

unfunded accrued liability. Consistent with the normal cost sharing provisions, these additional contributions would be shared between employers and PEPRA employees. This is modeled in scenario 3 of this disclosure.

II. Valuation Basis

Valuation Date: 06/30/2024

Valuation Group:

State			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 data used for the June 30, 2024 actuarial valuations.

Methods and Assumption: This cost analysis uses the methods described in Appendix A of the June 30, 2024 actuarial valuation and assumptions included in the November 2025 CalPERS Experience Study and Review of Actuarial Assumptions. 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 amount specified in Section 430(b) of Title 42 of the United States Code for 2026
    a. One hundred percent for a member whose service is included in the federal system, $184,500
    b. One hundred thirty-five percent for a member whose service is not included in the federal system, $249,075
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, further improve benefit formula for PEPRA Safety members to 3% at age 55 and the benefit limit shall be 90 percent of final compensation

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, 2027.

AB 1383 Cost Analysis
May 29, 2026

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 430(b) of Title 42 of the United States Code (i.e. $184,500 for those whose service is included in the federal system and $249,075 for those whose service is not included in the federal system for 2026). For reference, the 2026 compensation cap for PEPRA members is $159,733 for members whose service is included in the federal system and $191,679 for those whose service is not included in the federal system. 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 displayed 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	0.41%	0.21%	$914.9	$36.6
State Industrial	0.20%	0.10%	22.5	(0.3)
State Safety	0.23%	0.10%	136.6	15.0
State Peace Officers & Firefighters	0.19%	0.09%	82.9	7.2
California Highway Patrol	3.79%	1.36%	309.5	6.9
Schools	0.11%	0.06%	284.7	35.6

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	0.31%	$159.4	$8.5
Safety Pool – 2% at age 57	0.70%	6.5	0.2
Safety Pool – 2.5% at age 57	1.66%	3.8	0.0
Safety Pool – 2.7% at age 57	1.61%	362.1	9.2

Scenario 1 (cont'd)

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	Total Increase to Present Value of Future Benefits (millions)	Total Increase to Accrued Liabilities (millions)
Miscellaneous	Low	0.00%	0.00%	$925.6	$58.2
	Median	0.22%	0.11%		
	High	1.16%	0.65%		
Safety – 2% at age 57	Low	0.17%	0.00%	6.3	0.3
	Median	0.42%	0.09%		
	High	0.89%	0.43%		
Safety – 2.5% at age 57	Low	N/A	N/A	10.6	0.5
	Median	2.43%	1.35%		
	High	N/A	N/A		
Safety – 2.7% at age 57	Low	0.01%	0.01%	991.3	22.8
	Median	2.24%	0.95%		
	High	3.30%	1.62%		

The increase in the normal cost due to increasing the compensation limit would result in an increase to annual normal cost contributions of $241 million in the first year and increase the present value of future benefits by $4.2 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, 2027 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	0.22%	0.12%	$42.0	$1.1
State Peace Officers & Firefighters	0.45%	0.22%	153.9	7.5
California Highway Patrol	0.67%	0.24%	40.6	2.4

Local Agency Pooled Plans

Plan	Estimated Increase to Total Normal Cost	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Safety Pool – 2% at age 57	0.33%	$2.2	$0.0
Safety Pool – 2.5% at age 57	0.51%	0.8	0.0
Safety Pool – 2.7% at age 57	0.66%	101.3	6.1

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	0.32%	0.00%	$3.4	$0.2
	Median	0.46%	0.22%		
	High	0.56%	0.30%		
Safety – 2.5% at age 57	Low	N/A	N/A	1.8	0.1
	Median	0.52%	0.29%		
	High	N/A	N/A		
Safety – 2.7% at age 57	Low	0.55%	0.20%	214.2	16.0
	Median	0.69%	0.31%		
	High	0.81%	0.42%		

The increase in the normal cost due to the formula change would result in an increase to annual normal cost contributions of $38 million in the first year and increase the present value of future benefits by $560 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 Annual Normal Cost Contributions (millions)	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
State Miscellaneous	0.41%	0.21%	$48.1	$914.9	$36.6
State Industrial	0.20%	0.10%	1.5	22.5	(0.3)
State Safety	0.45%	0.22%	15.5	$179.6	$16.0
State Peace Officers & Firefighters	0.64%	0.31%	14.5	237.2	14.7
California Highway Patrol	4.56%	1.64%	18.2	358.7	9.1
Schools	0.11%	0.06%	19.0	284.7	35.6

Local Agency Pooled Plans

Plan	Estimated Increase to Total Normal Cost	Increase to Annual Normal Cost Contributions (millions)	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Miscellaneous Pool – 2% at age 62	0.31%	$11.5	$159.4	$8.5
Safety Pool – 2% at age 57	1.03%	0.5	$8.8	$0.2
Safety Pool – 2.5% at age 57	2.20%	0.2	4.7	0.1
Safety Pool – 2.7% at age 57	2.31%	24.9	473.6	15.1

Scenario 3 (cont'd)

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 Annual Normal Cost Contributions (millions)	Increase to Present Value of Future Benefits (millions)	Increase to Accrued Liabilities (millions)
Miscellaneous	Low	0.00%	0.00%	$63.9	$925.6	$58.2
	Median	0.22%	0.11%			
	High	1.16%	0.65%			
Safety – 2% at age 57	Low	0.73%	0.01%	0.6	9.8	0.5
	Median	0.75%	0.40%			
	High	1.38%	0.66%			
Safety – 2.5% at age 57	Low	N/A	N/A	0.7	12.6	0.7
	Median	3.01%	1.68%			
	High	N/A	N/A			
Safety – 2.7% at age 57	Low	0.71%	0.33%	62.4	1,234.3	38.1
	Median	3.01%	1.27%			
	High	4.00%	2.02%			

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 $282 million in the first year and increase the present value of future benefits by $4.8 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 benefit for this formula will be limited to 90 percent of final compensation. 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	10.02%	5.51%	$1,136.3	$200.5
State Peace Officers & Firefighters	4.50%	2.18%	846.7	159.7
California Highway Patrol	3.17%	1.14%	130.0	14.6

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	8.72%	$48.0	$4.6
Safety Pool – 2.5% at age 57	3.71%	6.4	1.1
Safety Pool – 2.7% at age 57	2.22%	371.0	79.5

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	5.80%	0.09%	$41.7	$7.9
	Median	6.59%	3.14%		
	High	7.65%	3.18%		
Safety – 2.5% at age 57	Low	N/A	N/A	11.5	2.0
	Median	3.12%	1.74%		
	High	N/A	N/A		
Safety – 2.7% at age 57	Low	1.76%	0.62%	775.5	193.1
	Median	2.13%	0.96%		
	High	2.58%	1.44%		

The increase in the normal cost due to the formula change to 3% at age 55 and 90% benefit limit would result in an increase to annual normal cost contributions of $353 million in the first year and increase the present value of future benefits by $3.4 billion.

Notes:

- **All estimated costs were calculated using CalPERS current actuarial assumptions and methods that were approved by the Board in November 2025.**
- 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 for these proposed formulas were left identical to the retirement assumptions for existing PEPRA formulas. 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 in some cases will 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.
- 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 is provided in Attachment 1 of this document. This information provides a more complete assessment of the possible financial implications of this Bill.
- With this proposed amendment, a greater number of PEPRA members could potentially be impacted by the IRC Section 415 limit. While a member's retirement benefit may be subject to limitation under their individualized IRC Section 415 limit, members who first become CalPERS members on or after January 1, 2013 are not eligible to receive a replacement benefit.

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, 2024. 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
Attachment 2 – Estimated Impact to Normal Cost

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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

This attachment provides a more complete assessment of the possible financial implications of AB 1383. It includes the 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.

All sensitivity analysis was performed based on Scenario 3 of the actuarial cost analysis. The following date, methods and assumptions were also used:

Valuation Date: 06/30/2024

Data used: This cost analysis was based on the data used for the June 30, 2024 actuarial valuations.

Methods and Assumption: This cost analysis uses the methods described in Appendix A of the June 30, 2024 actuarial valuation and assumptions included in the November 2025 CalPERS Experience Study and Review of Actuarial Assumptions . Please see calpers.ca.gov for more details.

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 4.30% and 2.50%, respectively. Shown below are various valuation results as of June 30, 2024 modified to reflect the estimated impact of May 13, 2026 version 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, 2024	**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	2.5%	2.5%	2.5%
Real Rate of Return	**3.3%**	**4.3%**	**5.3%**
State Miscellaneous			
a) Total Normal Cost	23.61%	18.48%	14.60%
b) PVB	212,378	181,393	157,315
c) AL	169,839	150,945	135,176

As of June 30, 2024	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	2.5%	2.5%	2.5%
Real Rate of Return	**3.3%**	**4.3%**	**5.3%**
State Industrial			
a) Total Normal Cost	23.80%	18.88%	15.14%
b) PVB	9,755	8,216	7,034
c) AL	7,517	6,595	5,839
State Safety			
a) Total Normal Cost	29.29%	23.77%	19.52%
b) PVB	29,981	25,425	21,890
c) AL	22,530	19,862	17,661
State Peace Officers & Firefighters			
a) Total Normal Cost	41.01%	32.01%	25.27%
b) PVB	95,331	80,727	69,473
c) AL	76,643	67,312	59,683
California Highway Patrol			
a) Total Normal Cost	44.24%	34.09%	26.50%
b) PVB	25,909	21,968	18,919
c) AL	21,198	18,604	16,484
Schools			
a) Total Normal Cost	22.12%	17.47%	13.99%
b) PVB	194,676	164,850	141,841
c) AL	152,502	134,199	119,092
Miscellaneous Pool – 2% at age 62			
a) Total Normal Cost	20.67%	16.46%	13.25%
b) PVB	7,866	5,881	4,487
c) AL	2,525	2,055	1,692
Safety Pool – 2% at age 57			
a) Total Normal Cost	33.08%	26.91%	22.16%
b) PVB	260	193	147
c) AL	60	49	40
Safety Pool – 2.5% at age 57			
a) Total Normal Cost	35.59%	27.69%	21.76%
b) PVB	74	53	38
c) AL	14	11	9
Safety Pool – 2.7% at age 57			
a) Total Normal Cost	39.60%	31.42%	25.23%
b) PVB	7,836	5,784	4,350
c) AL	1,892	1,531	1,252

As of June 30, 2024	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	2.5%	2.5%	2.5%
Real Rate of Return	**3.3%**	**4.3%**	**5.3%**
Miscellaneous Non-Pooled Plans			
a) Total Normal Cost - Median	23.34%	18.41%	14.70%
b) PVB	217,926	185,563	160,491
c) AL	175,068	155,047	138,077
Safety Non-Pooled Plans 2% at age 57			
a) Total Normal Cost - Median	38.02%	29.89%	23.77%
b) PVB	3,860	3,329	2,909
c) AL	3,315	2,930	2,613
Safety Non-Pooled Plans 2.5% at age 57			
a) Total Normal Cost - Median	43.72%	34.14%	27.00%
b) PVB	1,322	1,134	989
c) AL	1,130	997	889
Safety Non-Pooled Plans 2.7% at age 57			
a) Total Normal Cost - Median	42.83%	33.37%	26.55%
b) PVB	107,256	91,037	78,503
c) AL	86,485	76,053	67,518

Mortality Rate Sensitivity

The following tables look at the change in the June 30, 2024 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 2025. 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, 2024	**10% Lower Mortality Rates (millions)**	**Current Assumptions (millions)**	**10% Higher Mortality Rates (millions)**
State Miscellaneous			
a) Total Normal Cost	18.79%	18.48%	18.19%
b) PVB	185,455	181,393	177,674
c) AL	154,511	150,945	147,686
State Industrial			
a) Total Normal Cost	19.19%	18.88%	18.60%
b) PVB	8,378	8,216	8,067
c) AL	6,732	6,595	6,469
State Safety			
a) Total Normal Cost	24.12%	23.77%	23.44%
b) PVB	25,909	25,425	24,979
c) AL	20,268	19,862	19,488
State Peace Officers & Firefighters			
a) Total Normal Cost	32.38%	32.01%	31.67%
b) PVB	81,999	80,727	79,550
c) AL	68,431	67,312	66,277
California Highway Patrol			
a) Total Normal Cost	34.47%	34.09%	33.73%
b) PVB	22,309	21,968	21,653
c) AL	18,908	18,604	18,324
Schools			
a) Total Normal Cost	17.75%	17.47%	17.21%
b) PVB	168,321	164,850	161,665
c) AL	137,199	134,199	131,451
Miscellaneous Pool – 2% at age 62			
a) Total Normal Cost	16.75%	16.46%	16.18%
b) PVB	5,988	5,881	5,784
c) AL	2,095	2,055	2,019
Safety Pool – 2% at age 57			
a) Total Normal Cost	27.34%	26.91%	26.52%
b) PVB	196	193	191
c) AL	50	49	48

As of June 30, 2024	10% Lower Mortality Rates (millions)	Current Assumptions (millions)	10% Higher Mortality Rates (millions)
Safety Pool – 2.5% at age 57			
a) Total Normal Cost	28.02%	27.69%	27.38%
b) PVB	53	53	52
c) AL	11	11	11
Safety Pool – 2.7% at age 57			
a) Total Normal Cost	31.83%	31.42%	31.04%
b) PVB	5,859	5,784	5,715
c) AL	1,552	1,531	1,512
Miscellaneous Non-Pooled Plans			
a) Total Normal Cost - Median	18.72%	18.41%	18.11%
b) PVB	189,406	185,563	182,035
c) AL	158,397	155,047	151,974
Safety Non-Pooled Plans 2% at age 57			
a) Total Normal Cost - Median	30.24%	29.89%	29.56%
b) PVB	3,389	3,329	3,273
c) AL	2,985	2,930	2,879
Safety Non-Pooled Plans 2.5% at age 57			
a) Total Normal Cost - Median	34.50%	34.14%	33.80%
b) PVB	1,154	1,134	1,117
c) AL	1,015	997	981
Safety Non-Pooled Plans 2.7% at age 57			
a) Total Normal Cost - Median	33.81%	33.37%	32.99%
b) PVB	92,544	91,037	89,645
c) AL	77,388	76,053	74,823

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 5.58%, which is the Standard FTSE Pension Liability Index[1] discount rate as of June 30, 2025, net of assumed administrative expenses

	Estimated Valuation Results Reflecting AB 1383	
As of June 30, 2024	**Current Assumptions (millions)**	**LDROM Discount Rate (millions)**
Discount Rate	**6.8%**	**5.58%**
State Miscellaneous		
PVB	181,393	220,378
AL	150,945	174,491
State Industrial		
PVB	8,216	10,154
AL	6,595	7,747
State Safety		
PVB	25,425	31,158
AL	19,862	23,193
State Peace Officers & Firefighters		
PVB	80,727	99,120
AL	67,312	78,973
California Highway Patrol		
PVB	21,968	26,928
AL	18,604	21,846
Schools		
PVB	164,850	202,410
AL	134,199	157,038
Miscellaneous Pool – 2% at age 62		
PVB	5,881	8,410
AL	2,055	2,645

As of June 30, 2024	Current Assumptions (millions)	LDROM Discount Rate (millions)
Discount Rate	**6.8%**	**5.58%**
Safety Pool – 2% at age 57		
PVB	193	278
AL	49	63
Safety Pool – 2.5% at age 57		
PVB	53	79
AL	11	15
Safety Pool – 2.7% at age 57		
PVB	5,784	8,399
AL	1,531	1,985
Miscellaneous Non-Pooled Plans		
PVB	185,563	226,299
AL	155,047	180,709
Safety Non-Pooled Plans 2% at age 57		
PVB	3,329	3,995
AL	2,930	3,411
Safety Non-Pooled Plans 2.5% at age 57		
PVB	1,134	1,370
AL	997	1,163
Safety Non-Pooled Plans 2.7% at age 57		
PVB	91,037	111,457
AL	76,053	89,088

Estimated Impact to Normal Cost

This attachment provides a list of the estimated impact to the normal cost for Local Agency Plans due to AB 1383. Consistent with the normal cost sharing provisions, these additional contributions would be shared between employers and PEPRA employees.

As stated below, this cost analysis is based on data as of June 30, 2024. If passed, AB 1383 will become effective January 1, 2027. The actual change to the normal cost will be calculated based on the most recent available data which could be significantly different from the data used in this cost analysis which will impact these normal cost changes.

The listing below corresponds with Scenario 3 of the actuarial cost analysis. The following date, methods and assumptions were also used:

Valuation Date: 06/30/2024

Data used: This cost analysis was based on the data used in the June 30, 2024 actuarial valuations.

Methods and Assumption: This cost analysis uses the methods described in Appendix A of the June 30, 2024 actuarial valuation and assumptions included in the November 2025 CalPERS Experience Study and Review of Actuarial Assumptions. Please see calpers.ca.gov for more details.

Estimated Impact to Total Normal Cost for Pooled Plans

Pool	Change to Total Normal Cost
Miscellaneous Pool – 2% at age 62	0.3%
Safety Pool – 2% at age 57	1.0%
Safety Pool – 2.5% at age 57	2.2%
Safety Pool – 2.7% at age 57	2.3%

Estimated Impact to Normal Cost for Non-Pooled Plans

Employer	Plan Name	Change to PEPRA Normal Cost	Change to Total Normal Cost
Alameda Alliance for Health	Miscellaneous	0.6%	0.5%
Alameda County Fire Department	Safety	3.7%	1.3%
Alameda County Water District	Miscellaneous	1.0%	0.5%
Alta California Regional Center, Inc.	Miscellaneous	0.0%	0.0%
Antelope Valley Schools Transportation Agency	Miscellaneous	0.0%	0.0%
Bay Area Air Quality Management District	Miscellaneous	1.0%	0.6%
Cal Poly Corporation	Miscellaneous	0.2%	0.2%
Central Contra Costa Transit Authority	Miscellaneous	0.0%	0.0%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
Central Valley Regional Center, Inc.	Miscellaneous	0.0%	0.0%
City and County of San Francisco	Safety	0.8%	0.0%
City of Alameda	Miscellaneous	0.6%	0.4%
City of Alameda	Safety	3.8%	2.0%
City of Alhambra	Miscellaneous	0.1%	0.1%
City of Alhambra	Safety	3.0%	1.4%
City of Anaheim	Miscellaneous	0.4%	0.2%
City of Anaheim	Safety Police	3.4%	1.4%
City of Anaheim	Safety Fire	3.5%	1.4%
City of Antioch	Miscellaneous	0.2%	0.1%
City of Arcadia	Miscellaneous	0.2%	0.1%
City of Arcadia	Safety	3.3%	1.2%
City of Azusa	Miscellaneous	0.3%	0.2%
City of Bakersfield	Miscellaneous	0.1%	0.0%
City of Bakersfield	Safety Fire	1.8%	0.8%
City of Bakersfield	Safety Police	1.1%	0.6%
City of Baldwin Park	Miscellaneous	0.1%	0.0%
City of Banning	Miscellaneous	0.4%	0.2%
City of Benicia	Miscellaneous	0.3%	0.1%
City of Berkeley	Miscellaneous	0.4%	0.2%
City of Berkeley	Safety Fire	3.4%	1.3%
City of Berkeley	Safety Police	3.7%	1.4%
City of Beverly Hills	Miscellaneous	0.3%	0.2%
City of Beverly Hills	Safety	4.0%	1.7%
City of Brea	Miscellaneous	0.2%	0.1%
City of Brentwood	Miscellaneous	0.3%	0.1%
City of Buena Park	Miscellaneous	0.1%	0.1%
City of Burbank	Miscellaneous	0.4%	0.2%
City of Burbank	Safety Police	3.8%	1.8%
City of Burbank	Safety Fire	3.6%	1.4%
City of Burlingame	Miscellaneous	0.3%	0.2%
City of Camarillo	Miscellaneous	0.4%	0.2%
City of Campbell	Miscellaneous	0.7%	0.4%
City of Carlsbad	Miscellaneous	0.3%	0.2%
City of Carlsbad	Safety	3.0%	1.6%
City of Carson	Miscellaneous	0.2%	0.1%
City of Cerritos	Miscellaneous	0.1%	0.0%
City of Chico	Miscellaneous	0.1%	0.1%
City of Chico	Safety	1.5%	0.8%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
City of Chino	Miscellaneous	0.0%	0.0%
City of Chula Vista	Miscellaneous	0.2%	0.1%
City of Chula Vista	Safety	2.5%	1.4%
City of Claremont	Miscellaneous	0.0%	0.0%
City of Clovis	Miscellaneous	0.2%	0.1%
City of Clovis	Safety	2.7%	1.2%
City of Colton	Miscellaneous	0.4%	0.2%
City of Commerce	Miscellaneous	0.1%	0.0%
City of Compton	Miscellaneous	0.1%	0.0%
City of Concord	Miscellaneous	0.3%	0.1%
City of Concord	Safety	1.4%	0.4%
City of Corona	Miscellaneous	0.1%	0.1%
City of Corona	Safety Police	2.4%	0.9%
City of Coronado	Miscellaneous	0.3%	0.1%
City of Costa Mesa	Miscellaneous	0.3%	0.2%
City of Costa Mesa	Safety Police	3.4%	1.9%
City of Covina	Miscellaneous	0.1%	0.1%
City of Culver City	Miscellaneous	0.2%	0.1%
City of Culver City	Safety	3.5%	1.5%
City of Cupertino	Miscellaneous	0.7%	0.3%
City of Daly City	Miscellaneous	0.4%	0.2%
City of Daly City	Safety	3.5%	1.9%
City of Davis	Miscellaneous	0.2%	0.1%
City of Downey	Miscellaneous	0.2%	0.1%
City of Downey	Safety	3.1%	1.4%
City of El Cajon	Miscellaneous	0.2%	0.1%
City of El Cajon	Safety	2.3%	1.1%
City of El Centro	Miscellaneous	0.1%	0.0%
City of El Monte	Miscellaneous	0.2%	0.1%
City of El Monte	Safety	3.7%	1.1%
City of El Segundo	Miscellaneous	0.3%	0.2%
City of Encinitas	Miscellaneous	0.4%	0.2%
City of Escondido	Miscellaneous	0.1%	0.1%
City of Escondido	Safety	2.0%	0.9%
City of Eureka	Miscellaneous	0.1%	0.0%
City of Fairfield	Miscellaneous	0.3%	0.1%
City of Fairfield	Safety	3.4%	1.5%
City of Folsom	Miscellaneous	0.1%	0.1%
City of Folsom	Safety	2.3%	1.2%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
City of Fontana	Miscellaneous	0.1%	0.1%
City of Fontana	Safety	2.6%	1.2%
City of Foster City	Miscellaneous	0.5%	0.2%
City of Fremont	Miscellaneous	0.5%	0.3%
City of Fremont	Safety	3.5%	1.7%
City of Fullerton	Miscellaneous	0.2%	0.1%
City of Fullerton	Safety	3.0%	1.4%
City of Galt	Miscellaneous	0.1%	0.1%
City of Garden Grove	Miscellaneous	0.1%	0.0%
City of Garden Grove	Safety	2.9%	1.1%
City of Gardena	Miscellaneous	0.1%	0.1%
City of Gilroy	Miscellaneous	0.3%	0.2%
City of Glendale	Miscellaneous	0.3%	0.1%
City of Glendale	Safety	3.6%	1.2%
City of Glendora	Miscellaneous	0.1%	0.0%
City of Hanford	Miscellaneous	0.1%	0.0%
City of Hawthorne	Miscellaneous	0.1%	0.0%
City of Hayward	Miscellaneous	0.6%	0.3%
City of Hayward	Safety Fire	3.4%	0.9%
City of Hayward	Safety Police	3.4%	1.5%
City of Hemet	Miscellaneous	0.1%	0.1%
City of Hemet	Safety	1.8%	1.1%
City of Huntington Beach	Miscellaneous	0.2%	0.1%
City of Huntington Beach	Safety	3.3%	1.5%
City of Indio	Miscellaneous	0.2%	0.1%
City of Inglewood	Miscellaneous	0.2%	0.1%
City of Inglewood	Safety	2.9%	1.0%
City of Irvine	Safety	3.9%	1.5%
City of Irvine	Miscellaneous	0.2%	0.1%
City of La Habra	Miscellaneous	0.1%	0.0%
City of La Mesa	Miscellaneous	0.3%	0.2%
City of La Mesa	Safety	2.2%	1.0%
City of Laguna Beach	Miscellaneous	0.3%	0.1%
City of Lakewood	Miscellaneous	0.0%	0.0%
City of Lancaster	Miscellaneous	0.3%	0.1%
City of Livermore	Miscellaneous	0.5%	0.2%
City of Lodi	Miscellaneous	0.5%	0.3%
City of Lodi	Safety	2.7%	1.4%
City of Lompoc	Miscellaneous	0.2%	0.1%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
City of Long Beach	Miscellaneous	0.4%	0.2%
City of Long Beach	Safety	3.5%	1.4%
City of Lynwood	Miscellaneous	0.0%	0.0%
City of Madera	Miscellaneous	0.0%	0.0%
City of Manhattan Beach	Miscellaneous	0.2%	0.1%
City of Manteca	Miscellaneous	0.1%	0.1%
City of Menlo Park	Miscellaneous	0.5%	0.3%
City of Merced	Miscellaneous	0.1%	0.0%
City of Merced	Safety	2.0%	1.1%
City of Milpitas	Miscellaneous	0.7%	0.5%
City of Milpitas	Safety	3.4%	1.5%
City of Mission Viejo	Miscellaneous	0.1%	0.0%
City of Modesto	Miscellaneous	0.1%	0.1%
City of Modesto	Safety	2.0%	1.0%
City of Monrovia	Miscellaneous	0.2%	0.1%
City of Montebello	Miscellaneous	0.2%	0.1%
City of Montebello	Safety	2.9%	1.8%
City of Monterey	Miscellaneous	0.2%	0.1%
City of Monterey Park	Miscellaneous	0.1%	0.1%
City of Monterey Park	Safety	2.9%	1.2%
City of Moreno Valley	Miscellaneous	0.2%	0.1%
City of Morgan Hill	Miscellaneous	0.6%	0.3%
City of Mountain View	Miscellaneous	0.8%	0.4%
City of Mountain View	Safety	3.1%	1.0%
City of Napa	Miscellaneous	0.5%	0.3%
City of Napa	Safety	3.5%	1.5%
City of National City	Miscellaneous	0.2%	0.1%
City of National City	Safety	2.5%	1.3%
City of Newark	Miscellaneous	0.6%	0.3%
City of Newport Beach	Miscellaneous	0.2%	0.1%
City of Newport Beach	Safety	2.4%	0.8%
City of Norwalk	Miscellaneous	0.2%	0.1%
City of Novato	Miscellaneous	0.2%	0.2%
City of Oakland	Miscellaneous	0.5%	0.3%
City of Oakland	Safety	3.6%	2.0%
City of Oceanside	Miscellaneous	0.1%	0.1%
City of Oceanside	Safety	2.2%	1.1%
City of Ontario	Miscellaneous	0.3%	0.2%
City of Ontario	Safety Fire	3.9%	1.9%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
City of Ontario	Safety Police	3.6%	1.7%
City of Orange	Miscellaneous	0.2%	0.1%
City of Orange	Safety	3.3%	1.6%
City of Oxnard	Miscellaneous	0.3%	0.1%
City of Oxnard	Safety Police	2.2%	0.9%
City of Pacifica	Miscellaneous	0.4%	0.3%
City of Palm Desert	Miscellaneous	0.3%	0.1%
City of Palm Springs	Miscellaneous	0.2%	0.1%
City of Palm Springs	Safety	2.3%	1.0%
City of Palmdale	Miscellaneous	0.2%	0.1%
City of Palo Alto	Miscellaneous	0.8%	0.4%
City of Palo Alto	Safety	3.0%	1.3%
City of Pasadena	Miscellaneous	0.3%	0.2%
City of Pasadena	Safety	3.4%	1.5%
City of Paso Robles	Miscellaneous	0.2%	0.1%
City of Petaluma	Miscellaneous	0.5%	0.3%
City of Petaluma	Safety	3.0%	1.6%
City of Pico Rivera	Miscellaneous	0.3%	0.1%
City of Pittsburg	Miscellaneous	0.4%	0.2%
City of Pleasanton	Miscellaneous	0.5%	0.2%
City of Pleasanton	Safety Fire	3.8%	1.6%
City of Pomona	Miscellaneous	0.1%	0.1%
City of Pomona	Safety	2.9%	1.1%
City of Porterville	Miscellaneous	0.0%	0.0%
City of Poway	Miscellaneous	0.1%	0.1%
City of Rancho Cucamonga	Miscellaneous	0.1%	0.1%
City of Redding	Miscellaneous	0.3%	0.2%
City of Redding	Safety	2.2%	1.0%
City of Redlands	Miscellaneous	0.2%	0.1%
City of Redondo Beach	Miscellaneous	0.2%	0.1%
City of Redondo Beach	Safety	2.9%	1.4%
City of Redwood City	Miscellaneous	0.8%	0.4%
City of Redwood City	Safety	3.4%	1.4%
City of Rialto	Miscellaneous	0.1%	0.1%
City of Rialto	Safety	2.6%	1.2%
City of Richmond	Miscellaneous	0.4%	0.2%
City of Richmond	Safety	3.8%	1.6%
City of Riverside	Miscellaneous	0.3%	0.1%
City of Riverside	Safety	3.1%	1.2%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
City of Rocklin	Miscellaneous	0.1%	0.1%
City of Rohnert Park	Miscellaneous	0.2%	0.1%
City of Roseville	Miscellaneous	0.3%	0.1%
City of Roseville	Safety	2.6%	1.2%
City of Sacramento	Miscellaneous	0.3%	0.2%
City of Sacramento	Safety	3.0%	1.4%
City of Salinas	Miscellaneous	0.3%	0.2%
City of Salinas	Safety Police	3.6%	1.6%
City of San Bernardino	Miscellaneous	0.1%	0.1%
City of San Bernardino	Safety	3.0%	1.7%
City of San Bruno	Miscellaneous	0.4%	0.2%
City of San Buenaventura	Miscellaneous	0.3%	0.2%
City of San Buenaventura	Safety	3.1%	1.5%
City of San Clemente	Miscellaneous	0.2%	0.1%
City of San Leandro	Miscellaneous	0.4%	0.2%
City of San Luis Obispo	Miscellaneous	0.3%	0.2%
City of San Marcos	Miscellaneous	0.3%	0.2%
City of San Mateo	Miscellaneous	0.5%	0.3%
City of San Mateo	Safety	3.6%	1.8%
City of San Ramon	Miscellaneous	0.2%	0.1%
City of Santa Ana	Miscellaneous	0.3%	0.2%
City of Santa Ana	Safety	3.8%	1.8%
City of Santa Barbara	Miscellaneous	0.3%	0.2%
City of Santa Barbara	Safety Police	3.3%	1.6%
City of Santa Clara	Miscellaneous	0.4%	0.1%
City of Santa Clara	Safety	2.6%	0.6%
City of Santa Clarita	Miscellaneous	0.2%	0.1%
City of Santa Cruz	Miscellaneous	0.2%	0.1%
City of Santa Fe Springs	Miscellaneous	0.2%	0.1%
City of Santa Maria	Miscellaneous	0.2%	0.1%
City of Santa Monica	Miscellaneous	0.3%	0.1%
City of Santa Monica	Safety Fire	3.6%	1.2%
City of Santa Monica	Safety Police	3.8%	1.5%
City of Santa Rosa	Miscellaneous	0.2%	0.1%
City of Santa Rosa	Safety Fire	3.3%	1.4%
City of Santa Rosa	Safety Police	3.6%	1.9%
City of Simi Valley	Miscellaneous	0.1%	0.1%
City of Simi Valley	Safety	1.5%	0.6%
City of South Gate	Miscellaneous	0.1%	0.0%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
City of South Lake Tahoe	Miscellaneous	0.3%	0.2%
City of South San Francisco	Miscellaneous	0.5%	0.3%
City of South San Francisco	Safety	3.7%	1.4%
City of Stockton	Miscellaneous	0.2%	0.1%
City of Stockton	Safety	1.8%	0.9%
City of Sunnyvale	Miscellaneous	0.6%	0.3%
City of Sunnyvale	Safety	2.9%	1.1%
City of Temecula	Miscellaneous	0.2%	0.1%
City of Thousand Oaks	Miscellaneous	0.2%	0.1%
City of Torrance	Miscellaneous	0.2%	0.1%
City of Torrance	Safety Fire	4.0%	1.5%
City of Torrance	Safety Police	3.6%	1.2%
City of Tracy	Miscellaneous	0.3%	0.2%
City of Tracy	Safety	3.2%	1.6%
City of Tulare	Miscellaneous	0.1%	0.1%
City of Turlock	Miscellaneous	0.2%	0.1%
City of Tustin	Miscellaneous	0.1%	0.1%
City of Ukiah	Miscellaneous	0.3%	0.1%
City of Union City	Miscellaneous	0.4%	0.2%
City of Ud	Miscellaneous	0.1%	0.1%
City of Vacaville	Miscellaneous	0.3%	0.2%
City of Vacaville	Safety	3.7%	1.9%
City of Vallejo	Miscellaneous	0.3%	0.2%
City of Vallejo	Safety	3.4%	1.7%
City of Vernon	Miscellaneous	0.4%	0.1%
City of Victorville	Miscellaneous	0.2%	0.1%
City of Visalia	Miscellaneous	0.1%	0.0%
City of Visalia	Safety	1.8%	0.9%
City of Vista	Miscellaneous	0.2%	0.1%
City of Walnut Creek	Miscellaneous	0.4%	0.3%
City of Watsonville	Miscellaneous	0.2%	0.1%
City of West Covina	Miscellaneous	0.1%	0.1%
City of West Covina	Safety	3.0%	1.3%
City of West Hollywood	Miscellaneous	0.9%	0.4%
City of West Sacramento	Miscellaneous	0.2%	0.1%
City of Westminster	Miscellaneous	0.2%	0.1%
City of Whittier	Miscellaneous	0.2%	0.1%
City of Whittier	Safety	3.4%	1.8%
City of Woodland	Miscellaneous	0.1%	0.1%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
City of Woodland	Safety	1.4%	0.6%
City of Yorba Linda	Miscellaneous	0.1%	0.1%
City of Yuba City	Miscellaneous	0.1%	0.1%
Coachella Valley Water District	Miscellaneous	0.3%	0.1%
Coastal Developmental Services Fdn DBA Westside Regional Center	Miscellaneous	0.0%	0.0%
Conejo Recreation and Park District	Miscellaneous	0.1%	0.1%
Cooperative Personnel Services	Miscellaneous	0.3%	0.1%
Cosumnes Community Services District	Miscellaneous	0.1%	0.0%
Cosumnes Community Services District	Safety	2.1%	1.0%
County of Amador	Miscellaneous	0.1%	0.1%
County of Butte	Miscellaneous	0.1%	0.1%
County of Butte	Safety	1.5%	0.7%
County of Calaveras	Miscellaneous	0.0%	0.0%
County of Colusa	Miscellaneous	0.1%	0.0%
County of Del Norte	Miscellaneous	0.1%	0.0%
County of El Dorado	Miscellaneous	0.2%	0.1%
County of El Dorado	Safety	1.3%	0.6%
County of Glenn	Miscellaneous	0.1%	0.1%
County of Humboldt	Miscellaneous	0.1%	0.1%
County of Humboldt	Safety	0.7%	0.4%
County of Inyo	Miscellaneous	0.2%	0.1%
County of Kings	Miscellaneous	0.1%	0.1%
County of Kings	Safety	0.8%	0.4%
County of Lake	Miscellaneous	0.1%	0.1%
County of Lake	Safety	1.0%	0.5%
County of Lassen	Miscellaneous	0.1%	0.0%
County of Madera	Miscellaneous	0.1%	0.1%
County of Madera	Safety	1.0%	0.5%
County of Mariposa	Miscellaneous	0.1%	0.1%
County of Modoc	Miscellaneous	0.0%	0.0%
County of Mono	Miscellaneous	0.2%	0.1%
County of Monterey	Miscellaneous	0.4%	0.2%
County of Monterey	Safety	1.9%	0.8%
County of Napa	Miscellaneous	0.5%	0.3%
County of Nevada	Miscellaneous	0.3%	0.2%
County of Placer	Miscellaneous	0.2%	0.1%
County of Placer	Safety	1.7%	0.6%
County of Plumas	Miscellaneous	0.1%	0.1%
County of Riverside	Miscellaneous	0.3%	0.1%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
County of Riverside	Safety	0.8%	0.3%
County of San Benito	Miscellaneous	0.2%	0.1%
County of Santa Clara	Miscellaneous	0.3%	0.1%
County of Santa Clara	Safety	3.1%	1.4%
County of Santa Cruz	Miscellaneous	0.3%	0.2%
County of Santa Cruz	Safety Sheriff	2.9%	1.4%
County of Santa Cruz	Safety	1.3%	0.6%
County of Shasta	Miscellaneous	0.1%	0.1%
County of Shasta	Safety	0.7%	0.4%
County of Siskiyou	Miscellaneous	0.1%	0.0%
County of Solano	Miscellaneous	0.3%	0.1%
County of Solano	Safety	1.4%	0.7%
County of Sutter	Miscellaneous	0.1%	0.1%
County of Sutter	Safety	1.2%	0.6%
County of Tehama	Miscellaneous	0.1%	0.1%
County of Tehama	Safety	0.8%	0.4%
County of Trinity	Miscellaneous	0.1%	0.1%
County of Tuolumne	Miscellaneous	0.1%	0.1%
County of Yolo	Miscellaneous	0.2%	0.1%
County of Yolo	Safety	1.5%	0.7%
County of Yuba	Miscellaneous	0.1%	0.1%
County of Yuba	Safety	0.8%	0.5%
Cucamonga Valley Water District	Miscellaneous	0.3%	0.1%
East Bay Regional Park District	Miscellaneous	0.3%	0.2%
Eastern Municipal Water District	Miscellaneous	0.4%	0.1%
El Dorado Irrigation District	Miscellaneous	0.2%	0.1%
Far Northern Coordinating Council on Developmental Disabilities	Miscellaneous	0.0%	0.0%
Fresno City Housing Authority	Miscellaneous	0.1%	0.0%
Fresno County Housing Authority	Miscellaneous	0.0%	0.0%
Gold Coast Transit	Miscellaneous	0.0%	0.0%
Golden Gate Bridge Highway and Transportation District	Miscellaneous	0.6%	0.3%
Hayward Area Recreation and Park District	Miscellaneous	0.4%	0.2%
Helix Water District	Miscellaneous	0.5%	0.2%
Housing Authority of the City of Los Angeles	Miscellaneous	0.2%	0.1%
Housing Authority of the County of Kern	Miscellaneous	0.0%	0.0%
Inland Counties Regional Center, Inc.	Miscellaneous	0.0%	0.0%
Inland Empire Health	Miscellaneous	0.2%	0.2%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
Inland Empire Utilities Agency	Miscellaneous	0.6%	0.3%
Irvine Ranch Water District	Miscellaneous	0.4%	0.2%
Las Virgenes Municipal Water District	Miscellaneous	0.3%	0.1%
Los Angeles County Development Authority	Miscellaneous	0.1%	0.0%
Los Angeles County Office of Education	Miscellaneous	0.5%	0.2%
Los Angeles County Sanitation District No. 2	Miscellaneous	0.5%	0.2%
Los Angeles Unified School District	Safety	1.4%	0.4%
Marin Municipal Water District	Miscellaneous	0.6%	0.3%
Merced Irrigation District	Miscellaneous	0.4%	0.2%
Metropolitan Transportation Commission	Miscellaneous	1.2%	0.6%
Metropolitan Water District of Southern California	Miscellaneous	0.8%	0.3%
Monterey Regional Waste Management District	Miscellaneous	0.4%	0.3%
Monterey-Salinas Transit District	Miscellaneous	0.0%	0.0%
Nevada Irrigation District	Miscellaneous	0.1%	0.0%
North Bay Regional Center	Miscellaneous	0.0%	0.0%
North County Transit District	Miscellaneous	0.3%	0.2%
North Kern-South Tulare Hospital District	Miscellaneous	0.3%	0.2%
North Los Angeles County Regional Center, Inc.	Miscellaneous	0.0%	0.0%
North of the River Recreation and Park District	Miscellaneous	0.0%	0.0%
Northern California Power Agency	Miscellaneous	0.6%	0.2%
Oakland City Housing Authority	Miscellaneous	0.3%	0.2%
Omnitrans	Miscellaneous	0.1%	0.0%
Orange County Health Authority	Miscellaneous	0.3%	0.2%
Otay Water District	Miscellaneous	0.2%	0.1%
Padre Dam Municipal Water District	Miscellaneous	0.3%	0.1%
Placer County Water Agency	Miscellaneous	0.3%	0.1%
Public Transportation Services Corporation	Miscellaneous	0.4%	0.3%
Rancho California Water District	Miscellaneous	0.2%	0.1%
Rancho Simi Recreation & Park District	Miscellaneous	0.0%	0.0%
Regional Center of Orange County	Miscellaneous	0.1%	0.0%
Regional Center of the East Bay	Miscellaneous	0.0%	0.0%
Riverside County Flood Control and Water Conservation District	Miscellaneous	0.4%	0.2%
Riverside Transit Agency	Miscellaneous	0.1%	0.1%
Sacramento City Housing Authority	Miscellaneous	0.2%	0.2%
Sacramento Metropolitan Fire District	Safety	3.3%	1.5%
Sacramento Municipal Utility District	Miscellaneous	0.6%	0.3%

Estimated Impact to Normal Cost for Non-Pooled Plans			
Employer	**Plan Name**	**Change to PEPRA Normal Cost**	**Change to Total Normal Cost**
Sacramento Public Library Authority	Miscellaneous	0.1%	0.1%
San Andreas Regional Center, Inc.	Miscellaneous	0.1%	0.1%
San Bernardino County Housing Authority	Miscellaneous	0.1%	0.0%
San Diego Association of Governments	Miscellaneous	0.4%	0.2%
San Diego County Office Of Education	Miscellaneous	0.4%	0.1%
San Diego County Water Authority	Miscellaneous	0.6%	0.2%
San Diego Trolley, Inc.	Miscellaneous	0.0%	0.0%
San Francisco Bay Area Rapid Transit District	Miscellaneous	0.5%	0.3%
San Francisco Bay Area Rapid Transit District	Safety	3.1%	1.4%
San Mateo County Transit District	Miscellaneous	0.3%	0.2%
Santa Clara County Central Fire Protection District	Safety	3.3%	1.1%
Santa Clara County Housing Authority	Miscellaneous	0.4%	0.2%
Santa Clara Valley Transportation Authority	Miscellaneous	0.6%	0.3%
Santa Clara Valley Water District	Miscellaneous	1.1%	0.6%
Santa Cruz Metropolitan Transit District	Miscellaneous	0.1%	0.1%
Santa Margarita Water District	Miscellaneous	0.2%	0.1%
Sonoma County Library	Miscellaneous	0.1%	0.1%
South Central Los Angeles Regional Center for Developmentally Disabled Persons	Miscellaneous	0.1%	0.0%
Southern California Association of Governments	Miscellaneous	0.6%	0.3%
Southern California Regional Rail Authority	Miscellaneous	0.6%	0.4%
State Bar of California	Miscellaneous	0.5%	0.3%
Sweetwater Authority	Miscellaneous	0.3%	0.1%
Town of Los Gatos	Miscellaneous	0.6%	0.3%
Tri-Counties Association for the Developmentally Disabled	Miscellaneous	0.0%	0.0%
Union Sanitary District	Miscellaneous	0.9%	0.4%
University Enterprises, Inc.	Miscellaneous	0.3%	0.1%
Valley Mountain Regional Center, Inc.	Miscellaneous	0.0%	0.0%
Water Employee Services Authority	Miscellaneous	0.3%	0.1%

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
CALIFORNIA ASSOCIATION of WINEGRAPE GROWERS
FLASHER BARRICADE ASSN.
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
Oceanside CHAMBER of COMMERCE
ADVANCING OCEANSIDE
danville area
CHAMBER OF COMMERCE
BREA CHAMBER
CATALYST. CONVENER. CHAMPION.
NORWALK 100
1923 2023
CHAMBER OF COMMERCE
CARLSBAD
CHAMBER OF COMMERCE
The Chamber
Long Beach Area Chamber of Commerce
CMTA
CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION
CFCA
CALIFORNIA FUELS + CONVENIENCE ALLIANCE
CCBA
CALIFORNIA CRAFT BREWERS ASSOCIATION
MISSION VIEJO
Making Business Happen
CHAMBER OF COMMERCE
ASSOCIATED GENERAL CONTRACTORS OF CALIFORNIA
palm desert area chamber of commerce
CALIFORNIA RETAILERS ASSOCIATION
Consumers Economy Jobs
SANTA CLARITA VALLEY CHAMBER OF COMMERCE
THE ASSOCIATED GENERAL CONTRACTORS SAN DIEGO CHAPTER
SWCLC Southwest California Legislative Council
American Property Casualty Insurance Association
INSURING AMERICA
NFIB
CALIFORNIA TRUCKING ASSOCIATION
We drive for a living. Safety is our priority.
SAN JUAN CAPISTRANO CHAMBER OF COMMERCE
vista Chamber of Commerce
THE COUNTY OF FRESNO 1856
FB California Farm Bureau.
Standing up for all farmers and ranchers
CORONA CHAMBER OF COMMERCE
California Hospital Association

June 9, 2026

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

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

Dear Chair Smallwood-Cuevas,

The undersigned organizations respectfully **OPPOSE 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 Bureau
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
Corona 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
San Juan Capistrano Chamber of Commerce
Santa Clarita Valley Chamber of Commerce
Schools Insurance Group
Southwest California Legislative Council
Vista Chamber of Commerce

CC: The Honorable Liz Ortega, California State Assembly

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

June 8, 2026

The Honorable Dr. Akilah Weber Pierson
Chair, Senate Health Committee
1021 O Street, Suite 3310
Sacramento, CA 95814

RE: AB 1607 (González) Emergency medical services
As Amended March 26, 2026 – SUPPORT
Set for Hearing in Senate Health Committee on June 17, 2026

Dear Dr. Weber Pierson:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Assembly Bill 1607 by Assembly Member Mark González. This measure would extend the sunset date on the Maddy Emergency Medical Services (EMS) Fund until January 1, 2037, preserving access to critical, life-saving emergency medical care.

Under current law, counties may establish a Maddy EMS Fund through a resolution by the board of supervisors electing to levy a $2 fee for every $10 of fines on all crimes, penalties, or forfeitures imposed by the court. These funds are used to reimburse physicians and hospitals who treat uninsured patients in emergency departments, as well as providing funding for local EMS purposes. Additionally, 15 percent of the funds collected are allocated to the "Richie's Fund," which supports pediatric trauma centers.

Emergency departments are required to provide care for patients regardless of their health care coverage status. When an uninsured patient is unable to pay for their care, a hospital or physician may submit for reimbursement to their county's Maddy Fund if they are located in one of the 51 counties with an established Maddy EMS Fund. While these funds do not fully offset the cost of uncompensated care, they provide a critical financial lifeline to emergency departments already under significant fiscal strain.

Absent legislative action, the statutory authority for the Maddy Fund will sunset on January 1, 2027, eliminating this important source of financial assistance for providers. At the same time, millions of Californians are at risk of losing their health care coverage as H.R. 1 is

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

implemented, including new Medi-Cal work requirements beginning in 2027. As the number of uninsured individuals increases, demand for emergency services will grow, placing additional pressure on already financially fragile safety-net providers. Without the Maddy Fund, some emergency departments may be forced to reduce services or close altogether, impacting access to care for entire communities.

AB 1607 would extend the Maddy EMS Fund for an additional ten years, until January 1, 2037, ensuring continued support for emergency care providers and the patients who rely on them. For these reasons, CSAC strongly supports AB 1607. Should you have any questions regarding our position, please do not hesitate to contact me at bmccarthy@counties.org.

Sincerely,

Brendan McCarthy
Senior Legislative Advocate

CC: The Honorable Mark González, Member, California State Assembly
Honorable Members and Consultants, Senate Health Committee
Joe Parra, Consultant, Senate Republican Caucus

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

June 11, 2026

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

RE: AB 1660 (Schiavo) Public guardians and public administrators
As Amended April 9, 2026 – SUPPORT
Set for hearing in Senate Judiciary Committee on June 23, 2026

Dear Senator Umberg:

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 authorizing the imposition of 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, Senate Judiciary Committee
Morgan Branch, Consultant, Senate Republican Caucus

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

June 8, 2026

The Honorable Josh Becker
Chair, Senate Natural Resources and Water Committee
1021 O Street, Suite 3220
Sacramento, CA 95814

RE: AB 1699 (Rogers) Good Fire Act: Prescribed Fire Liability Pilot Program: burn bosses: California Environmental Quality Act.
As amended on May 18, 2026 – SUPPORT
To be heard in the Senate Natural Resources & Water Committee on June 23, 2026

Dear Chair Becker,

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.

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

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 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, Senate Natural Resources and Water Committee

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

June 8, 2026

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

RE: AB 1786 (Harabedian) Public contracts: best value construction contracting for counties, cities, and the San Gabriel Valley Council of Governments.
As amended March 12, 2026 – Support
To be heard in Senate Local Government Committee June 17, 2026.

Dear Senator Durazo,

On behalf of the California State Association of Counties (CSAC), I am writing to express our support for AB 1786, which expands and strengthens best value contracting authority for local agencies.

AB 1786 makes an important improvement by lowering the eligible project threshold from $1 million to $500,000. This change will allow more projects, particularly smaller but time-sensitive county infrastructure and community improvements, to utilize best value procurement. By expanding eligibility, the bill enables more counties to expedite contracting processes and deliver projects more efficiently.

Providing access to best value contracting at a lower threshold will help counties select qualified contractors based on experience, safety, and performance which will reduce delays and minimize costly change orders. Ultimately, this means faster delivery of critical public works and better outcomes for taxpayers.

For these reasons, CSAC respectfully supports AB 1786. Please don't hesitate to contact me at mneuburger@counties.org if you have any questions.

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,

Mark Neuburger
Legislative Advocate
California State Association of Counties

CC: The Honorable John Harabedian, Member, California State Assembly
Member and consultants, Senate Committee on Local Government

June 10, 2026

The Honorable Tom Umberg, Chair
Senate Judiciary Committee
1021 O Street, Suite 6610
Sacramento, CA 95814

Re: **AB 1908 (McKinnor): Civil actions: victims' compensation funding: validating proceedings**
As revised 6/3/26 – SUPPORT
Set for hearing 6/23/26 – Senate Judiciary Committee

Dear Senator Umberg:

On behalf of the Urban Counties of California (UCC) and the California State Association of Counties, we write to express our support for Assembly Bill 1908, Assembly Member McKinnor's measure that would provide clarification to the existing law related to validation actions to specify that bonds and other forms of debt financing necessary to satisfy the obligations of a victims' compensation fund is authorized as of the date the establishment of such a fund via the adoption of a resolution or ordinance by a county board of supervisors. This important legislation will assist those counties seeking to finance a victims' compensation fund.

As you are keenly aware, counties, as well as other local agencies, are facing significant legal exposure and considerable costs for civil claims. As a result, funding these claims has become especially difficult. Los Angeles County, for example, faces many billions of dollars in liability stemming from claims of childhood sexual assaults occurring at several county-run youth facilities. One avenue to help facilitate payments to claimants is a self-funded victims' compensation fund. The challenge, however, is financing the fund when cash is not readily available. Obligation bonds are commonly used to pay awards from bench and jury trials, as well as court-approved settlements. Current law, however, limits their use to these types of legal obligations. The Code of Civil Procedure does not allow obligation bonds to finance a victims' fund. AB 1908 provides the legal mechanism to do exactly that.

AB 1908 addresses a statutory gap by giving counties the flexibility to consider creating a victims' fund to cover civil liabilities that are so large as to necessitate the use of obligation bonds. As a result, we support AB 1908 and respectfully request your "aye" vote.

Please do not hesitate to reach out if you have questions regarding our position.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties

cc: Members and Consultants, Senate Judiciary Committee
The Honorable Tina McKinnor, California State Assembly
Andi Leibenbaum, County of Los Angeles

June 8, 2026

The Honorable Henry Stern
Chair, Senate Emergency Management Committee
1020 N Street, Room 549
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 Stern,

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. 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 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, Senate Emergency Management Committee

June 9, 2026

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

Re: **AB 1954: Municipal golf courses: reservations**
Notice of SUPPORT *(As Amended 6/4/2026)*

Dear Senator Umberg,

The League of California Cities and the California State Association of Counties are pleased to support AB 1954 (Ward), which would prohibit an operator of a third-party golf reservation service platform from listing, advertising, promoting, selling, or transferring reservations for a golf course operator without a written agreement.

Unauthorized third-party reservation services charge higher rates and make it difficult for residents to book tee-times at municipal courses where fees are kept affordable to ensure access to residents. Many of these third-party brokers are using sophisticated websites and paying for search engine optimization, which confuses consumers who do not intend to use these platforms.

AB 1954 is a commonsense approach that will provide local jurisdictions with the option to pursue legal action against these platforms operating without an agreement. Currently, municipalities have minimal legal standing to stop unauthorized third-party reservation services and cease and desist orders are commonly ignored.

Our organizations appreciate your leadership on this issue and look forward to working with your office. If you have any questions, do not hesitate to contact us at cgrinder@calcities.org or cdelgado@counties.org.

Sincerely,

Caroline Grinder
Legislative Advocate
League of California Cities

Charles Delgado
Legislative Advocate
California State Association of Counties

June 10, 2026

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

Re: **Assembly Bill 1961 (Ahrens). Civil actions: protective orders: workplace violence.**
As Amended April 16, 2026 – SUPPORT
To be heard in Senate Judiciary Committee on June 16, 2026

Dear Chair Umberg,

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), California Association of Joint Powers Authorities (CAJPA), and the California Special Districts Association (CSDA), 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 from the public. In recent years, county registrars have faced bomb threats[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 all employees at the employer's workplace or a location where a group of employees perform their primary job duties. 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

[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)

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

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

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

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

CC: The Honorable Patrick Ahrens, Member, California State Assembly
Members and Consultants, Senate Judiciary Committee
Margie Estrada, Chief Consultant, Senate Judiciary Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

June 9, 2026

The Honorable Jesse Arreguín
Chair, Senate Housing Committee
1021 O Street, Suite 3330
Sacramento, CA 95814

RE: AB 2002 (Solache) Local government assistance: Regional Early Action Planning Fund.
As Introduced 2/17/2026 – Notice of Support

Dear Senator Arreguín,

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, Cal Cities, 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, Senate Housing Committee
The Honorable José Luis Solache, California State Assembly

California State Association of Counties

RCRC

May 28, 2026

The Honorable Jesse Arreguín
Chair, Senate Housing Committee
1021 O Street, Suite 3330
Sacramento, CA 95814

RE: AB 2127 (Johnson) Accessory dwelling units: private sewage disposal systems. – OPPOSE
As amended April 6, 2026

Dear Chair Arreguín,

On behalf of the California State Association of Counties (CSAC) and the Rural County Representatives of California (RCRC), we respectfully write to express our **opposition** to AB 2127 (Johnson), which requires the approval of accessory dwelling units (ADUs) that are served by private septic systems.

Counties are responsible for the local public health issues as well as implementing and enforcing state and federal public health standards related to onsite wastewater treatment systems (OWTS), which apply to private septic systems. While we appreciate the author's goal of expanding housing opportunities in rural areas, we have significant concerns that AB 2127, as currently drafted, would undermine existing public health protections and place counties at risk of violating state regulatory requirements.

Conflict with State Water Resources Control Board Requirements
AB 2127 would restrict local health officers' authority to deny or condition ADU approvals where an existing septic system is determined to be functioning and has capacity, except under limited circumstances. Specifically, the bill prohibits requiring system upgrades if the system is verified by a qualified professional to have capacity, unless there is substantial evidence of a present risk. However, this framework conflicts with the State Water Resources Control Board's OWTS Policy (Water Code § 13291), which requires local agencies to implement Local Agency Management Programs (LAMPs) that include standards for siting, design, cumulative impacts, and long-term system performance. LAMPs are comprehensive regulatory programs designed to protect groundwater quality and public health across an entire watershed, particularly in areas with sensitive environmental conditions. By limiting local agency discretion and substituting a narrower, project-by-project capacity determination, AB 2127 risks forcing counties to approve ADUs that are inconsistent with

their approved LAMPs. This creates a direct compliance conflict, exposing counties to potential state and federal enforcement consequences and undermining the integrity of statewide water quality protections.

Undermining Local Public Health Authority

Existing law appropriately allows local agencies to evaluate whether septic systems are suitable for additional wastewater loads based on site-specific conditions as well as the cumulative impact this system would have on the local watershed. AB 2127, however, shifts decision-making toward a narrow determination of current system function, rather than long-term performance, environmental context, or cumulative system impacts across a watershed. This change would weaken the ability of local health officers to prevent groundwater contamination and protect drinking water supplies—particularly in rural and disadvantaged communities that rely on private wells. To be clear, no county is willing to sacrifice the large communities need for clean and safe drinking water for the sake of an individual's desire to add an outbuilding on their property.

Conclusion

While we support efforts to expand housing availability critically needed in rural areas, these efforts must not come at the expense of groundwater quality or public health. AB 2127 would create legal and regulatory conflicts with the State Water Resources Control Board's OWTS Policy and undermine the ability of local agencies to fulfill their statutory responsibilities to provide clean watersheds and ensure new development doesn't add fecal matter to the local water sources. For these reasons, we respectfully urge your Committee to vote no on AB 2127 to ensure consistency with state water quality requirements.

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties

Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California

CC: The Honorable Natasha Johnson, California State Assembly
Members and consultants, Senate Housing Committee
Kerry Yoshida, Consultant, Senate Republican Caucus

June 9, 2026

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

RE: AB 2341 (Fong) Local government: emergency response services: use of languages other than English.
As amended June 4, 2026 – SUPPORT
To be heard in the Senate Committee on Emergency Management on June 16, 2026

Dear Chair Stern,

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, Senate Committee on Emergency Management
Cassie Royce Flemming, Principal Consultant, Senate Committee on Emergency Management
Ryan Eisberg, Policy Consultant, Senate Republican Caucus

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

June 9, 2026

The Honorable Josh Becker
Chair, Senate Human Services Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: AB 2478 (Schultz) Kinship family approval
As Revised April 15, 2026 – SUPPORT
Set for Hearing in Senate Human Services Committee on June 15, 2026

Dear Senator Becker:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Assembly Bill 2478 by Assembly Member Nick Schultz. This measure implements a streamlined Kinship Family Approval (KFA) pathway and clarifies emergency placement rules so that children can be placed quickly and safely with people who already know their needs.

The Resource Family Approval (RFA) process was first enacted in 2011 and was intended to unify California's previous patchwork system of foster care approval processes. All prospective caregivers of children in out-of-home care are subject to the same RFA process, including relative and nonrelative extended family members (NREFMs). While there are many benefits to the streamlined RFA process, the inflexibility of a single, unified approval process has created unnecessary barriers to approve relatives, extended family members for Indian Children, and NREFMs.

AB 2478 would establish a separate, streamlined KFA process for prospective kin caregivers while preserving child safety protections. This measure recognizes that caring for kin is unique, and the focus for supporting kin caregivers should be on their ability to provide quality care, maintain connections with the child's culture and community, and maintain their overall safety. AB 2478 will help maximize kin placements, honoring the child welfare system's goal of safely placing children with kin caregivers whenever possible.

CSAC Officers

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

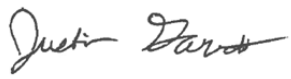
2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

For these reasons, CSAC supports AB 2478 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.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Nick Schultz, Member, California State Assembly
Honorable Members and Consultants, Senate Human Services Committee
Spencer Winkle, Consultant, Senate Republican Caucus

June 12, 2026

The Honorable Josh Becker
Chair, Assembly Committee on Natural Resources and Water
1021 O Street, Suite 3220
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 16, 2026 – SUPPORT
To be heard in the Senate Natural Resources and Water Committee on June 23, 2026

Dear Chair Becker,

On behalf of the California State Association of Counties (CSAC) and League of California Cities (Cal Cities), 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 (Cal Cities) at msparkskranz@calcities.org

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

CC: The Honorable Cottie Petrie-Norris, Member of the California State Assembly
Members, Senate Natural Resources and Water Committee

June 10, 2026

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

Re: **Assembly Bill 2545 (Schiavo). Report: labor force impact: artificial intelligence.**
As Amended April 14, 2026 - Support if Amended.
To be heard in the Senate Committee on Labor, Public Employment and Retirement June 17, 2026.

Dear Chair Smallwood Cuevas,

On behalf of the California State Association of Counties (CSAC) and Urban Counties of California (UCC), League of California Cities (Cal Cities), and the Association of California School Administrators (ACSA), 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.

We respectfully request that a local agency employer representative 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 and avoid potential future costs or unfunded mandates for local governments. While we have concerns regarding other legislation that is designed to limit, regulate, or prohibit new technologies in the workplace, AB 2545 takes better approach: evaluate the impacts of AI systems analytically before imposing new restrictions.

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

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

CC: The Honorable Pilar Schiavo, Member, California State Assembly
Members and Consultants, Senate Committee on Labor, Public Employment and Retirement
Alma Perez, Chief Consultant, Senate Committee on Labor, Public Employment and Retirement
Jesse Herzer, Policy Consultant, Republican Caucus

June 12, 2026

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

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As amended April 9, 2026 – SUPPORT
To be heard in Senate Local Government Committee on June 17, 2026

Dear Chair Durazo:

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.

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

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.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties
ejungwirth@counties.org

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CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Senate Local Government Committee
Anton Favorini-Csorba, Chief Consultant, Senate Local Government Committee
Ryan Eisberg, Policy Consultant, Senate Republican Caucus

June 11, 2026

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

Re: **AB 2656 (Petrie-Norris): Public employees: notice: artificial intelligence performing service within scope of work**
As amended 4/14/26 – OPPOSE
Set for hearing 6/17/26 – Senate Labor, Public Employment, and Retirement Committee

Dear Senator Smallwood-Cuevas:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the California State Association of Counties (CSAC), the California Special Districts Association (CSDA), the League of California Cities (CalCities), the California Association of Recreation and Park Districts (CARPD), the Association of California School Administrators (ACSA), and Public Risk, Innovation, Solutions, and Management (PRISM), we respectfully write to share our 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.

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) and Ralph C. Dills Act, 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, non-education 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.

AB 2656 appears to be a solution without a clearly identified problem. 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

Ethan Nagler
Legislative Representative
California Association of Recreation and Park Districts

Jason Schmelzer
Legislative Advocate
Public Risk Innovation, Solutions, and Management (PRISM)

Johnnie Pina
Legislative Affairs, Lobbyist
League of California Cities

Dorothy Johnson
Legislative Advocate
Association of California School Administrators

cc: The Honorable Cottie Petrie-Norris, California State Assembly
Members and Consultants, Senate Labor, Public Employment, and Retirement Committee

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

June 10, 2026

The Honorable Tim Grayson
Chair, Senate Banking and Financial Institutions Committee
1020 N Street, Room 522
Sacramento, CA 95814

RE: AB 871 (Stefani) Mandated reporters of suspected financial abuse of an elder or dependent adult
As Amended January 16, 2026 – SUPPORT
Set for Hearing in Senate Banking and Financial Institutions Committee on June 17, 2026

Dear Senator Grayson:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Assembly Bill 871 by Assembly Member Catherine Stefani. This measure will improve prevention of elder and dependent adult financial abuse by expanding requirements for mandated reporters at financial institutions.

Each year, millions of vulnerable adults fall victim to telephone and internet-based fraud and financial scams. County Adult Protective Service (APS) agencies are on the front lines of combatting elder and dependent adult financial abuse and exploitation, of which 36 percent of APS reports are due to financial abuse. Although financial institutions are already required to report suspected abuse, many only report to their local police department or APS agency, making cross-jurisdiction criminal investigations difficult.

AB 871 requires financial institutions to provide annual training to mandated reporters on how to internally escalate suspected financial abuse and report it to both local and federal authorities, including the FBI's Internet Crime Complaint Center (IC3) and the Federal Trade Commission (FTC). AB 871 also requires a report to the FBI's IC3 within two working days when suspected financial abuse is reported, and if suspected abuse is discovered within 48 hours of a transaction, the financial institution must share information on reporting mechanisms with the impacted elder or dependent adult within 24 to 48 hours. Expanding reports to federal authorities and improving coordination between financial institutions, law

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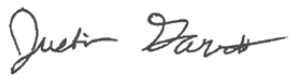
Graham Knaus

enforcement, and federal agencies will aid local law enforcement in their investigations and improve the chance to recover stolen funds.

For these reasons, CSAC supports AB 871. 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.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Catherine Stefani, Member, California State Assembly
Honorable Members and Consultants, Senate Banking & Financial Institutions Committee
Spencer Winkle, Consultant, Senate Republican Caucus

June 3, 2026

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

RE: Assembly Bill 1198 (Haney) – OPPOSE UNLESS AMENDED
As Amended on January 22, 2026

Dear Chair Smallwood-Cuevas,

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 Transit Association (Cal Transit) 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, 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. While we appreciate the author's efforts to narrow the bill and acknowledgment that the intent is to address a limited set of large, long-duration projects, we remain concerned that the measure could create significant uncertainty in public contracting, increase taxpayer costs, and jeopardize the delivery of critical public infrastructure projects.

Under current law, 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. Contractors incorporate those known labor costs into their bids, allowing public agencies to accurately evaluate proposals, establish project budgets, secure financing, and award contracts with certainty. We are concerned that

further changes to the wages mid-stream will result in uncertainty in bidding and contracting and put projects in jeopardy.

For projects funded through fixed appropriations, grants, bond proceeds, voter-approved local revenues, or adopted local budgets, unexpected labor cost increases may require agencies to reduce project scope, delay construction, or cancel projects altogether. It would be challenging to predict how many future wage determinations could occur during the project period and adequately plan for cost increases, which may put potential projects at risk.

We believe there may be a path forward that addresses the concerns identified in Governor Newsom's veto of AB 2182 (Haney, 2024), which contained identical provisions to this bill, while preserving the author's intent to focus on a narrow category of large, long-term projects. Specifically, we encourage amendments that would limit the bill's applicability to projects that:

- Exceed $35 million in total project cost;
- Are anticipated to last more than 24 months; and
- Utilize alternative project delivery methods such as Design-Build (DB), Progressive Design-Build (PDB), Construction Manager/General Contractor (CM/GC), or similar delivery structures.

These amendments would better target the specific large, multiyear projects referenced in prior veto messages while avoiding impacts on the vast majority of traditional public works projects that are competitively bid and completed within a shorter timeframe.

In addition, we request consideration of amendments that would help preserve public contracting stability and reduce unintended impacts on local agencies, including:

- Require the state to fully reimburse local agencies for increased costs attributable to prevailing wage determinations issued after contract award;
- Exempt projects funded through voter-approved local measures, locally generated revenues, adopted local budgets, or time-sensitive state and federal grants where cost escalation or rebidding could jeopardize project delivery or funding eligibility;
- Exempt emergency response, public safety, wildfire, flood control, water, wastewater, and other critical infrastructure projects where procurement certainty and rapid delivery are essential;
- Require advance notice and fixed implementation windows for DIR determinations affecting active contracts to avoid mid-project procurement and pricing disruptions; and
- Clarify that contractors may not assert delay claims, suspend performance, or pursue damages against local agencies arising solely from DIR-issued prevailing wage updates.

By introducing additional cost uncertainty into public works contracting, the bill will increase overall project costs and further challenge the affordability of critical infrastructure investments for state and local governments. For these reasons, we respectfully oppose AB 1198 unless amended and look forward to continuing discussions with the author and committee staff to address these concerns. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

Sarah Dukett
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Mishaal Gill
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cc: The Honorable Matt Haney, Member of the California State Assembly
Members of the Senate Labor, Public Employment, and Retirement Committee
Alma Pérez, Chief Consultant, Senate Labor, Public Employment, and Retirement Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

June 5, 2026

The Honorable Diane Papan
Chair, Assembly Water, Parks, and Wildlife
California State Assembly
1020 N St, Room 160
Sacramento, California 95814

Support for SB 1085 (Durazo) – Water Supply Planning Act

Dear Assembly Member Papan:

We, the undersigned, are proud to support SB 1085 (Durazo), the Water Supply Planning Act. We ask for your "aye" vote when the bill is heard in the Assembly Water, Parks, and Wildlife Committee.

SB 1085 restores an important safeguard on water availability for new large developments that was inadvertently circumvented through recent legislation.

For more than three decades, state law has required water supply assessments (WSAs) for certain large development projects in recognition of the important link between land use planning and water supply planning. A WSA is an informational tool that focuses on identifying the long-term water supply needed to serve large development projects. California law requires a city or county, upon determining that a project is subject to CEQA, to request a WSA if a project meets certain requirements, including that the project is more than 500 residential units or a non-residential project that demands a similar or greater amount of water. A WSA also allows for early coordination between a water supplier, a land use entity, and a developer. This relationship and information exchange, at the beginning stages of a project, helps ensure efficient project implementation throughout the process.

Recent laws that have eliminated CEQA analysis have inadvertently meant that WSAs are no longer triggered in certain circumstances, even though the project still meets the WSA criteria under state law. SB 1085 restores this important tool for ensuring that new large developments have a long-term water supply, which is critical in light of the impacts that climate change and future droughts could have on areas throughout the state.

Sincerely,

Reuben Duarte
Vice President, Policy and Legislation
APA California

Anthony Tannehill
Legislative Representative
California Special Districts Association

Kylie Wright
Policy Advocate
Association of California Water Agencies

Charles Delgado
Legislative Advocate
California State Association of Counties

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Matt Clifford
California Director
California Trout Unlimited

Shannon Olivieri Hovis
Chief Strategy Officer
California Environmental Voters

Jennifer Capitolo
Executive Director
California Water Association

Alexandra Biering
Policy Director
California Farm Bureau

Council Member Caity Maple
Chair, Law & Legislation Committee
City of Sacramento

Andrea Abergel
Director of Water
California Municipal Utilities Association

Suzanne Hume
Educational Director & Founder
CleanEarth4Kids.org

Jennifer Clary
California Director
Clean Water Action

Catherine Van Dyke
Director of Water Policy
Community Alliance with Family Farmers

Kelsey Hinton
Policy Director
Community Water Center

Ernesto A. Avila
Board President
Contra Costa Water District

Ashley Overhouse
Water Policy Advisor
Defenders of Wildlife

Kathy Viatella
Manager of Legislative Affairs
East Bay Municipal Utility District

Jann Dorman
Executive Director
Friends of the River

Paul Cook, P.E.
General Manager
Irvine Ranch Water District

Dave Pedersen
General Manager
Las Virgenes Municipal Water District

Nataly Escobedo Garcia, Ph.D.
Policy Manager, Water/Climate Programs
Leadership Counsel for Justice and Accountability

Dennis O'Connor
Legislative Coordinator
Mono Lake Committee

Kimberly A. Thorner
General Manager
Olivenhain Municipal Water District

Johnnie Carlson
Associate Director
Planning and Conservation League

James Peifer
Executive Director
Regional Water Authority

Ben Eichenberg
Senior Staff Attorney
San Francisco Baykeeper

Ann Hayden & Sarah Woolfe
Co-Chairs
SJVWCAP

Molly Culton
Chapter Organizing Director
Sierra Club CA

Joshua Golka
Head of State Government Relations
Valley Water

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

Elizabeth Dougherty, Ph.D.
Executive Director
Wholly H2O

June 9, 2026

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

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

Dear Chair Kalra,

On behalf of the County Behavioral Health Directors Association (CBHDA), the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Public Administrators, Public Guardians and Public Conservators (CAPAPGPC), **we write to share our opposition to Senate Bill 1016 (Blakespear), as amended on May 14, 2026.** SB 1016 fundamentally changes the voluntary nature of CARE and explicitly contradicts the expressed goal of the CARE ACT to decrease involuntary conservatorships, by introducing an involuntary pathway while simultaneously bypassing due process protections.

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

- **CARE Court petitions can be dismissed for a wide range of reasons, including failure of the respondent to engage in the process or show up in court.** This bill would allow for a court to order an involuntary mental health evaluation for the purposes of LPS when a CARE Court petition is dismissed and it finds that there is probable cause to determine that a person meets LPS criteria. Given that some courts are allowing petitions without substantive documentation of an individual's condition or independent clinical review, and without the county's ability to verify allegations made by petitioners, counties may be ordered by the court to involuntarily detain and evaluate individuals for whom an involuntary evaluation is not necessary or reasonable. Involuntary detention can be incredibly intrusive, and even traumatic; as such, the existing law attempts to establish a reasonably high bar for exercising this authority. By attaching the court-ordered involuntary evaluation to petitions that are dismissed, this law would potentially lead to unfounded involuntary detentions and evaluations, leading to a diversion of county behavioral health staff away from individuals who are more in need.

- **Gives the Court the authority to weigh in on an individual's motivation and degree of insight into their condition, without appropriate training or evidence.** Throughout SB 1016, it is stated that a reason for the court to find an individual eligible for a court ordered involuntary evaluation could be their lack of insight into their mental disorder. Courts are not clinicians, and given that the purpose of this bill is to force an evaluation, a person's insight into their mental health condition would not be known. The purpose of a mental health evaluation would be to make such a determination. Conversely, a lack of engagement in CARE Court proceedings would not necessarily be indicative of an individual's dangerousness to self or others, thereby creating a new, lower bar for establishing sufficient evidence that an individual might be in need of involuntary detention.

  Bypasses due process protections required under LPS Welfare and Institutions Code Sections 5200-5204. The provisions in this bill would increase a court's discretion over county behavioral health's clinical ability to properly assess and provide the court with evidence of probable cause for LPS criteria to be met for someone who is petitioned for an involuntary evaluation. The bill omits key legal standards currently outlined in WIC 5202, which explicitly states that a county-designated individual must prepare a prepetition screening and shall conduct "a reasonable investigation of the allegations and make a reasonable effort to personally interview the subject of the petition". Instead, this bill requires a court to substitute the CARE Act petition dismissal form for a court ordered involuntary evaluation under this pathway[1], bypassing multiple built-in due process protections.

- **Introduces 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.

[1] As proposed under WIC 5975 (e)(3).

- **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. Further, WIC 5203 would hold an individual liable for requesting a court-ordered evaluation if they know that an individual does not meet LPS criteria. These protections would be bypassed in this bill for individuals coming through the CARE pathway.

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 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 and due process 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

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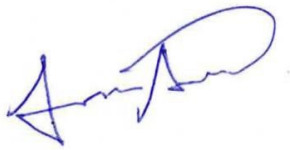
Brendan McCarthy
Senior Legislative Advocate
CSAC
bmccarthy@counties.org

Sarah Dukett
Policy Advocate
RCRC
sdukett@rcrcnet.org



Tom Scott, Executive Director
California Association of Public Administrators,
Public Guardians, and Public Conservators
tscott@capapgpc.org

CC: Honorable Senator Catherine Blakespear
Honorable Members of the Assembly Judiciary Committee
Kristian Wright, Counsel, Assembly Judiciary Committee
Tom Clark, Counsel, Assembly Judiciary Committee

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

June 10, 2026

The Honorable Alex Lee
Chair, Assembly Human Services Committee
1020 N Street, Room 122
Sacramento, CA 95814

RE: SB 1051 (Menjivar) Foster care: childcare.
As Introduced February 12, 2026 – SUPPORT
Set for Hearing in Assembly Human Services Committee on June 16, 2026

Dear Assemblymember Lee:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Senate Bill 1051 by Senator Caroline Menjivar. This measure will ensure that there is no wrong door for eligible children and caregivers in accessing the Emergency Child Care Bridge Program for foster children.

Established through the 2017 Budget Act, the Emergency Child Care Bridge (ECCB) program was established to mitigate a key barrier to finding and maintaining stable family homes for children in foster care: access to affordable childcare. The ECCB program helps to immediately stabilize vulnerable children in the most appropriate placement, and provides them with a bridge to long-term, high quality early education programs.

SB 1051 would allow child care navigators to submit referrals to county child welfare agencies for their approval of a voucher for an eligible foster child. County social workers would retain full authority to determine eligibility, but they would no longer be the sole gatekeepers to initiating the process. This will not only alleviate workforce pressures on county social workers, but it will improve timely access to affordable childcare for foster youth and their caregivers.

For these reasons, CSAC supports SB 1051. 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

President
Susan Ellenberg
Santa Clara County

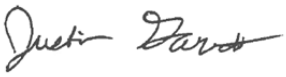
1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Caroline Menjivar, Member, California State Senate
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

June 8, 2026

The Honorable Lisa Calderon
Chair, Assembly Insurance Committee
1020 N Street, Room 369
Sacramento, CA 95814

RE: SB 1054 (Cabaldon) Unemployment insurance: reporting requirements.
As Amended March 26, 2026 – SUPPORT
Set for Hearing in Assembly Insurance Committee on June 17, 2026

Dear Assemblymember Calderon:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Senate Bill 1054 by Senator Christopher Cabaldon. This measure directs the Employment Development Department (EDD) to collect additional information from employers about wages to support automated eligibility determinations for health and nutrition assistance programs.

California counties administer federal safety net programs like Medicaid (Medi-Cal) and SNAP (CalFresh) on behalf of the state. The county eligibility workforce plays a critical role in ensuring eligible individuals and families obtain and retain their Medi-Cal coverage and CalFresh benefits. Recent federal legislation, H.R. 1, expands work requirements for CalFresh, adds new work requirements for Medi-Cal, and increases the frequency and complexity for Medi-Cal eligibility determinations and verifications. H.R. 1 places substantial fiscal and administrative pressures on counties and threatens the sustainability of all county programs.

SB 1054 will help mitigate some of these workload impacts on counties by improving the employment information available to support automated Medi-Cal and CalFresh work requirement exemptions and eligibility determinations. By streamlining access to reliable and enhanced employment data, the measure would reduce burdensome paperwork requirements for Californians seeking benefits while easing workload pressures on county eligibility staff. Increased automation and improved data sharing will help modernize the

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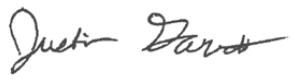
CEO
Graham Knaus

eligibility process, reduce administrative inefficiencies, and prevent eligible Californians from unnecessarily losing access to critical health and nutrition assistance.

For these reasons, CSAC supports SB 1054. 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.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Christopher Cabaldon, Member, California State Senate
Honorable Members and Consultants, Assembly Insurance Committee
Bill Lewis, Consultant, Assembly Republican Caucus

June 10, 2026

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

RE: **SB 222 (Wiener) Permitting: Residential water and HVAC installations.**
Notice of OPPOSITION *(As of 1/5/26)*

Dear Chair Haney,

On behalf of the League of California Cities (Cal Cities), California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC), we respectfully oppose SB 222.

Our members are aggressively working with their communities to improve energy efficiency and encourage the adoption of advanced water heating technologies. However, SB 222 is premised on the notion that local permitting is a significant barrier to adoption. The state's own research demonstrates otherwise.

The California Public Utilities Commission (CPUC) commissioned California Water Heating Market Study identified two primary barriers to homeowner adoption of heat pump water heaters: emergency replacement situations and high upfront costs. Notably, local permitting did not emerge as a significant barrier to consumer adoption.

According to the study, installers reported that nearly half of all water heater replacements occur during emergency failures, while other research cited in the report estimates the share may be as high as 90 percent. When a household loses hot water, homeowners are understandably focused on restoring service as quickly as possible. Faced with the prospect of electrical upgrades, retrofit work, contractor coordination, and higher equipment costs, many consumers choose the fastest and least expensive replacement option available.

The study further found that installers consistently identified the higher upfront cost of heat pump water heater systems as a major obstacle. Industry sources similarly report installation costs for energy efficient HVAC and heat pump systems ranging from $5,000 to $15,000 or more, often excluding necessary electrical upgrades (new panel). For many older homes, panel upgrades and dedicated circuits can add thousands of dollars to the total project cost. These costs, **not permit fees,** are what drive consumer decisions.

Local permitting is not a barrier to electrification; rather, it is the mechanism through which cities ensure installations are safe, code-compliant, and appropriate for local conditions.

Establishing a state-dictated permitting framework for HVAC systems sets a troubling precedent for future preemption of local building, zoning, and land-use authority.

Moreover, permit fees are already limited by law. Cities and counties may only charge fees that reflect the reasonable cost of providing the service, a principle reaffirmed by Proposition 26. A permitting authority that exceeds a reasonable amount or who cannot justify their fee amount is already against the law so additional safety guardrails are unnecessary.

If the Legislature's goal is to accelerate adoption, it should focus on the barriers identified by its own research. The California Energy Commission's Home Electrification and Appliance Rebates (HEEHRA) program demonstrated substantial consumer demand for financial assistance ($8,000 rebates) but has exhausted available funding. Expanding rebate and incentive programs would directly address the primary obstacle identified by homeowners and contractors alike: affordability.

Finally, SB 222 would impose new mandates on local governments by requiring automated permitting systems regardless of whether a jurisdiction already processes these permits efficiently. Many cities currently issue these permits over the counter or through expedited review. The bill would nevertheless require local agencies to incur new software, implementation, training, maintenance, and administrative costs without evidence that such expenditures will materially increase adoption rates.

SB 222 seeks to solve an affordability problem through a permitting mandate. The state's own research demonstrates that homeowners are constrained primarily by the high upfront costs of equipment, electrical upgrades, and emergency replacement circumstances, not local permitting processes. Rather than imposing new mandates on local governments, the Legislature should focus its efforts on expanding consumer incentives and rebate programs that directly address the barriers identified by contractors, homeowners, and the CPUC itself.

For these reasons, we respectfully opposes SB 222.

Sincerely,

Damon Conklin
Legislative Advocate
League of California Cities

Mark Neuburger
Legislative Advocate
California State Association of Counties

Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California

cc: The Honorable Scott Wiener
Members, Assembly Committee on Housing and Community Development

June 9, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended June 4, 2026)*

Dear Chair Kalra:

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, Public Risk Innovation, Solutions, and Management, California Association of Recreation and Park Districts, and California County Superintendents 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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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.

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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 as well as Proposition 98 dollars intended for students and classrooms.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For schools, this is a direct drain on Prop 98 funding. 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, and schools facing declining enrollment, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Further, 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.

Applying SB 947 to Public Employers May Lead to Unintended Consequences
Local governments and local 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 these 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 primarily relied on to make a discipline, termination, or deactivation decision – a line which may not

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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. The carve out introduces significant legal uncertainty by requiring employers, employee organizations, and ultimately the courts to determine when a particular negotiated provision is sufficient to displace the statutory requirements. 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.

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Governor Gavin Newsom

June 9, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended June 4, 2026)*

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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, Public Risk Innovation, Solutions, and Management, California Association of Recreation and Park Districts, and California County Superintendents 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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June 9, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended June 4, 2026)*

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June 9, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended June 4, 2026)*

Dear Chair Bauer-Kahan:

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, Public Risk Innovation, Solutions, and Management, California Association of Recreation and Park Districts, and California County Superintendents 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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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. The carve out introduces significant legal uncertainty by requiring employers, employee organizations, and ultimately the courts to determine when a particular negotiated provision is sufficient to displace the statutory requirements. 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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CC:

The Honorable Jerry McNerney
Honorable Members, Assembly Privacy and Consumer Protection Committee
Slater Sharp, Senior Consultant, Assembly Privacy and Consumer Protection Committee
Tess Scherkenback, Consultant, Assembly Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of
Governor Gavin Newsom

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June 8, 2026

The Honorable Isaac Bryan
Chair, Assembly Natural Resources Committee
California State Capitol, Room 164
Sacramento, CA 95814

RE: SB 955 (Blakespear) Beverage containers: supermarkets: reverse vending machines.
As amended on May 18, 2026 – SUPPORT

Dear Chair Bryan,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we write in **support** of Senate Bill 955 (Blakespear) related to beverage container recycling.

California enacted the Beverage Container Recycling and Litter Reduction Act in 1986, establishing a deposit-refund system requiring consumers to pay a California Redemption Value (CRV) on eligible beverage containers and receive that deposit back upon recycling. The program is intended to reduce litter, increase recycling, and conserve resources by achieving an 80% recycling rate for all CRV containers. However, despite achieving a statewide recycling rate of approximately 70% in 2024, many consumers face limited access to convenient redemption opportunities, undermining the program's effectiveness and, in practice, preventing many consumers from reasonably redeeming the deposits they pay.

Over time, the Legislature has modernized the Act in response to identified implementation challenges, gaps in covered beverage container types, and advances in recycling systems, including expanding the program to include wine, distilled spirits, and certain juice containers; establishing "convenience zones" to improve consumer access; and incorporating reverse vending machines (RVMs) to streamline redemption. However, the definition of "supermarket," last updated in the 1980s, excludes certain beverage retailers that warrant inclusion under the current program framework.

SB 955 refines the statutory definition of "supermarket" by increasing the gross annual sales threshold to $5 million and by eliminating the requirement related to whether the

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retail store operates a bakery or deli. For these reasons, we are pleased to **support** SB 955. 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 Catherine Blakespear, Member of the California State Senate
Members, Assembly Natural Resources Committee

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June 9, 2026

The Honorable Gail Pellerin
Chair, Assembly Elections Committee
1020 N Street, Room 365
Sacramento, CA 95814

RE: SB 970 (Cervantes) Military or overseas voters.
As Amended May 21, 2026 - SUPPORT
To be heard in the Assembly Elections Committee on June 17, 2026

Dear Chair Pellerin,

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 return of ballots from military and overseas voters delivered through secure methods.

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

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For these reasons, we are pleased to support SB 970 (Cervantes). 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, Assembly Elections Committee
Ethan Jones, Chief Consultant, Assembly Elections Committee
Daryl Thomas, Policy Consultant, Assembly Republican Caucus

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June 2, 2026

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

RE: AB 763 (Ward) Timber harvesting: waste discharge requirements.
As Amended on January 5, 2026 – Notice of SUPPORT

Dear Chair Blakespear,

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,

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Charles Delgado
Legislative Advocate
California State Association of Counties

CC: The Honorable Christopher M. Ward, Member of the California State Assembly
Members, Senate Environmental Quality Committee

June 1, 2026

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

RE: AB 1153 (Bonta) Illegal disposal site abatement.
As Amended on January 22, 2026 – Notice of SUPPORT

Dear Chair Blakespear,

The California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), and the League of California Cities (Cal Cities) are pleased to **support** AB 1153 (Bonta), related to illegal disposal site abatement and abandoned recreational vehicles.

Illegal dumping degrades natural resources, threatens public health and safety, and blights communities, while leaving local governments to bear the significant costs of cleanup and restoration. According to the California Department of Resources Recycling and Recovery (CalRecycle), local governments spend tens of millions of dollars each year responding to and removing illegally dumped waste. Abandoned vehicles increase the complexity and cost of illegal dumping cleanup, requiring local governments to navigate legal notice requirements and waiting periods before vehicles can be towed, dismantled, and disposed of. There is a growing need for financial assistance from local jurisdictions for the purposes of illegal disposal site abatement including the costly management of abandoned vehicles.

For these reasons, CSAC, RCRC, and Cal Cities **support** AB 1153 (Bonta), which would authorize CalRecycle, upon appropriation, to fund the removal and disposal of abandoned recreational vehicles, as well as the development of enforcement strategies, local enforcement teams, and illegal dumping enforcement officers.

If you have any questions, please contact Jordan Wells (CSAC) at jwells@counties.org, John Kennedy (RCRC) at jkennedy@rcrcnet.org, or Caroline Grinder (Cal Cities) at cgrinder@calcities.org.

Sincerely,

Jordan Wells
Legislative Advocate
California State
Association Of Counties

John Kennedy
Senior Policy Advocate
Rural County Representatives
of California

Caroline Grinder
Legislative Advocate
League of California Cities

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June 2, 2026

The Honorable Steve Padilla
Chair, Senate Insurance Committee
1020 N Street, Room 258
Sacramento, CA 95814

RE: AB 1559 (Calderon) Residential property insurance images.
As amended on April 13, 2026 - SUPPORT

Dear Chair Padilla,

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.

Sincerely,

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Charles Delgado
Legislative Advocate
California State Association of Counties

CC: The Honorable Lisa Calderon, Member of the California State Assembly
Members, Senate Insurance Committee

AB 2180 (Ward) - SUPPORT

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June 3, 2026

The Honorable Maria Elena Durazo
Chair, Senate Local Government Committee
State Capitol, Room 112
Sacramento, CA 95814

RE: AB 2180 (Ward) – SUPPORT

Dear Chair Durazo:

On behalf of the Association of California Water Agencies (ACWA) and undersigned organizations, I am writing to respectfully express our strong support for AB 2180, which would clarify how water agencies comply with Proposition 218 when setting water rates. This clarification would provide much needed predictability for water agencies, support California's water-use conservation goals, and minimize unnecessary legal disputes over water rates. ACWA is pleased to sponsor this legislation and appreciates Assemblymember Ward's leadership in advancing this critical issue.

Since the passage of Proposition 218 in 1996, water agencies have been required to ensure that rates do not exceed the proportional cost of service attributable to each parcel. To meet this constitutional standard, water agencies typically engage independent experts and rely on rigorous cost-of-service studies. However, despite these efforts, high-volume water users have continued to challenge the constitutionality of water agencies' rate structures in court. Recent appellate court decisions on this matter have resulted in differing – and in some cases conflicting – decisions, creating uncertainty for water agencies about how proportionality must be demonstrated. Because of this conflict, it is now both necessary and appropriate for the Legislature to clarify how the courts and water agencies should interpret the Constitution.

AB 2180 would create clear, consistent standards for water agencies statewide, helping them to confidently develop constitutionally-sound rates and continue to deliver safe and reliable water to their communities. Recent appellate court decisions, like those in *Coziahr v. Otay Water District* (2024) and *Patz v. City of San Diego* (2025), impose rigid interpretations of Proposition 218 that require unfeasible levels of precision at the expense of practical administration of water rates. For example, under these court decisions, water agencies could be forced to trace the flow of water from each source of supply to each parcel, molecule by molecule, even when water supplies are commingled in the distribution system.

Conversely, the court's December 8, 2025 decision in *Dreher v. City of Los Angeles Department of Water and Power* (2025) supports a framework that is consistent with Proposition 218 and aligns with longstanding industry practice. AB 2180 would codify the *Dreher* decision. This approach respects the wishes of voters by maintaining a rigorous standard of justifying water rates while giving water agencies the flexibility to set rates in a way that reflects the true cost of service and ensures that high-volume water users pay for the infrastructure necessary to provide reliable water supplies during droughts and times of high demand.

Public water and sewer agencies provide essential government services for the benefit of communities, agriculture, industries, and the environment. Collectively, these agencies are

responsible for ensuring a consistent and reliable water supply, safeguarding the quality of drinking water, planning, constructing, and maintaining critical infrastructure, and much more. With climate change presenting unprecedented challenges, these agencies also must adapt and enhance aging infrastructure to mitigate the impacts of increasingly frequent and severe climate-related events. Public agencies throughout California are making generational investments to build 21st Century infrastructure for a 21st Century climate while making every effort to keep water affordable.

Without legislative clarification, water agencies and ratepayers will both continue to face costly and unnecessary legal disputes. The revenue necessary for water agencies to fulfill their essential government functions comes almost entirely from service rates and assessments subject to Proposition 218. The recent rise in litigation has made it increasingly difficult for water agencies to have the financial stability they need to provide reliable, safe, and affordable water to Californians.

For these reasons, ACWA and the undersigned organizations strongly support AB 2180 and respectfully request your "AYE" vote when the bill is heard in the Senate Local Government Committee. If you have any questions about our position or this bill, please contact Soren Nelson at SorenN@acwa.com.

Sincerely,

Soren Nelson
Senior Policy Advocate
Association of California Water Agencies

Marcus Detwiler
Legislative Representative
California Special Districts Association

Jeff Gouveia
General Manager
Bear Valley Water District

Charles Delgado
Legislative Advocate
California State Association of Counties

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General Manager
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Tia Fleming
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Andrea Abergel
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California Municipal Utilities Association

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Mayor
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Caity Maple
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Chair, Law and Legislation Committee
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Mark Stapp
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Pravani Vandeyar
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El Dorado Irrigation District

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El Toro Water District

Bruce Kamilos
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Elk Grove Water District

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Elsinore Valley Municipal Water District

Nicholas Schneider
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Helix Water District

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Watermaster
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David Pedersen
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Las Virgenes Municipal Water District

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President, Board of Directors
Marin Water

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General Manager
McKinleyville Community Services District

Matthew Hurley
General Manager
McMullin Area Groundwater Sustainability Agency

Elizabeth Salomone
General Manager
Mendocino County Russian River Flood Control

Brian Macy
General Manager
Mission Springs Water District

Justin Scott-Coe
General Manager/Chief Executive Officer
Monte Vista Water District

Nick Turner
General Manager
Montecito Water District

Ara Azhderian
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Kimberly A. Thorner
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Jose Martinez
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Otay Water District

Kyle Swanson
General Manager/Chief Executive Officer
Padre Dam Municipal Water District

Dennis D. LaMoreaux
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Palmdale Water District

Kevin Phillips
District Manager
Paradise Irrigation District

Joe Basulto
General Manager
Pico Water District

Jake Wiley
General Manager
Rainbow Municipal Water District

Danielle Coats
Director of Public and Government Affairs
Rancho California Water District

James Peifer
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Regional Water Authority

Timothy R. Shaw
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Rio Linda Elverta Community Water District

Tom Coleman
General Manager
Rowland Water District

Eric Will
Policy Advocate
Rural County Representatives of California

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General Manager
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Dennis Herrera
General Manager
San Francisco Public Utilities Commission

Adam Larsen
General Manager
San Juan Water District

Matt Stone
General Manager
Santa Clarita Valley Water Agency

Albert C. Lau, P.E.
General Manager
Santa Fe Irrigation District

Robert Grantham
General Manager
Santa Margarita Water District

Paul Hughes
General Manager
South Tahoe Public Utility District

Kent Nelson
General Manager
Stinson Beach County Water District

Justin Hopkins
General Manager
Stockton East Water District

Sean Barclay
General Manager
Tahoe City Public Utility District

Thomas Neisler
General Manager
Tehachapi-Cummings County Water District

Matthew Litchfield
General Manager
Three Valleys Municipal Water District

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Deanna Jackson
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Lindsay Leahy
General Manager
Valley Center Municipal Water District

Joshua Golka
Head of State Government Relations
Valley Water

Brett Hodgkiss
General Manager
Vista Irrigation District

Jared Macias
Interim General Manager
Walnut Valley Water District

John Thiel
General Manager
West Valley Water District

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

Gene Hernandez
President, Board of Directors
Yorba Linda Water District

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June 5, 2026

The Honorable Josh Becker
Chair, Senate Natural Resources and Water Committee
1021 O Street, Suite 3220
Sacramento, CA 95814

RE: AB 2739 (Soria) Water: affordability and system stabilization.
As amended April 6, 2026 – Notice of SUPPORT
To be heard in the Senate Natural Resources and Water Committee on June 23, 2026.

Dear Chair Becker,

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

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the bill sponsors to create a viable, sustainable funding source that does not include any new taxes or fees.

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®
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June 3, 2026

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

RE: SB 872 (McNerney) Delta Levees and Canal Subsidence Fund.
As Amended May 14, 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 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 implementation of the Sustainable Groundwater Management Act. Without this

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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, Assembly Committee on Water, Parks, and Wildlife
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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June 1, 2026

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

RE: SB 997 (Caballero) North Fork Kings Groundwater Sustainability Agency: lien authority.
As amended on April 30, 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 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 charges. 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

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Graham Knaus

benefit of agriculture, 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

CC: The Honorable Anna Caballero, Member of the California State Senate
Members, Assembly Committee on Water, Parks, and Wildlife

June 2, 2026

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

RE: AB 1048 (Chen) – Contract Disputes
OPPOSE, AS AMENDED JANUARY 22, 2026

Dear Chair Smallwood-Cuevas,

The undersigned organizations respectfully **OPPOSE AB 1048, as amended January 22, 2026**. Our organizations represent a broad base of California's public and private sector employers, insurers and medical networks that have an interest in workers' compensation and advocate for a balanced workers' compensation system that provides injured workers with fair benefits, while keeping costs low for employers. *While our coalition is opposed to AB 1048, we have had several lengthy meetings with the author and sponsors and offered amendments that would move us to neutral, but those amendments have been rejected.*

How Billing Works in Workers' Compensation

Providers in the workers' compensation system do not bill for services at the rate dictated by the Official Medical Fee Schedule (the OMFS is a standardized schedule of payment rates for services established by the Division of Workers' Compensation through regulations) or at their contracted network rates. They instead bill at their "usual and customary" rate and then claims administrators must accurately adjust those bills to reflect the OMFS and/or applicable contracts. When the adjustment is done and payment is made, an Explanation of Review (EOR) is delivered to the provider explaining the adjustments to fee schedule or contracted network rate.

The underlying issue being addressed in AB 1048 is that disputes arise about the adjustment of the bills in this process. Providers are sometimes unclear about the various network contracts they have signed and do not keep copies of the associated documents. It is also true that claims administrators and bill reviewers sometimes make incorrect adjustments. If there is a dispute over the proper adjustment of the OMFS, then the IBR process is the right venue. If there is a dispute over a contracted rate, then the dispute resolution provisions within that contract provide a remedy.

Problems with AB 1048 Amendments

AB 1048 is trying to help providers understand more clearly when a contracted rate applies. The bill requires the EOR sent to providers to include specific information about the underlying contract relied upon to justify the payment level. If that contract is not provided within 30 business days, then payment must be automatically made at the OMFS amount instead of the discounted contract rate.

While we oppose AB 1048 in its current form, we do believe our concerns can be resolved and the bill can be balanced. We are not opposed to providing a method by which providers can receive a copy of the applicable contract. In fact, we have proposed a version of this same policy, but the approach taken in AB 1048 creates new problems:

- **Creates Loophole Allowing Providers to Get Around Mutually Agreed Upon Terms of a Contract -** As drafted the bill would allow providers to request a copy of the contract with every EOB, understanding that "late" delivery of the contract would invalidate their contracted discount and result in a higher payment. Providers in the workers' compensation system are highly educated and intelligent professionals who do not need the protection of the state with regards to these mutually agreed upon contracts.

  Unfortunately, there are some providers in the workers' compensation system who have a long and storied history of relentlessly exploiting narrow administrative loopholes for financial gain. Just in the last decade the legislature has had to address widespread abuse in drug repackaging, spinal surgery implant reimbursements, and even the mundane lien process. We expect that a small but impactful number of doctors will relentlessly abuse this loophole if implemented in its current form. This will result in higher costs for the system, which means higher workers' compensation premiums for all employers in California. On the other side, the sponsors have presented one anecdotal story but have no industry-wide data to show a need AB 1048 in its current form.

- **The Penalty is Inappropriate –** Providers sign contracts to serve network patients at a discounted rate because they benefit from the steady stream of patient referrals. They have a duty to track their own contractual relationships and understand the agreements they have made. While we do not mind sending these providers copies of the contracts they've entered, we don't think we should be financially penalized for late delivery of legal documents these providers should already have. Moreover, those providers have already received the benefit of the bargain under their contracts (e.g., steerage of injured workers to the provider as part of an MPN) and are now trying to eliminate their obligations under the contract (i.e., the discount).

- **Allows Unlimited Copies of Contracts –** As drafted, a provider could request a copy of the same contract repeatedly without limitation. There is no reason that networks should be required to provide repeat copies of contract to providers who in fact already have them. We propose limiting providers to one copy of each contract to which they are a party in each calendar year. This would keep requests at a reasonable volume and prevent a small number of providers from abusing the system.

For these reasons, and more, we **OPPOSE AB 1048** and respectfully urge your "no" vote in committee so stakeholders can have more time to come to an agreement.

Sincerely,

Lisa Anne Hurt-Forsythe, American Association of Payers, Administrators and Networks
Laura Curtis, American Property Casualty Insurance Association
Faith Borges, California Association of Joint Powers Authorities
Ashley Hoffman, California Chamber of Commerce
Jason Schmelzer, California Coalition on Workers' Compensation
Jeff Rush, California Joint Powers Insurance Authority
Benjamin Ebbink, California League of Food Producers
Eric Lawyer, California State Association of Counties
Jen Hamelin, Public Risk, Innovation, Solutions, and Management
Leilani Aguinaldo, Schools Excess Liability Fund
Jean Hurst, Urban Counties of California

CC: Legislative Unit, Office of Governor Gavin Newsom
Department of Industrial Relations

June 5, 2026

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

Re: **AB 1337 (Ward): Information Practices Act of 1977**
As amended June 1, 2026 – OPPOSE
To be heard in the Senate Committee on Privacy, Digital Technologies, and Consumer Protection June 15, 2026

Dear Chair Cabaldon,

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), California Special Districts Association (CSDA), the Association of California Healthcare Districts (ACHD), County Welfare Directors Association of California (CWDA), California Association of Public Hospitals (CAPH), California Association of Joint Powers Authorities (CAJPA), the County Health Executives Association of California (CHEAC), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Municipal Clerks Association (CMCA), the District Hospital Leadership Forum (DHLF), the California Hospitals Association (CHA), the California Association of Recreation and Park Districts (CARPD), the Emergency Medical Services Administrators' Association of California (EMSAAC), and the California Behavioral Health Directors Association (CBHDA), we write to respectfully oppose AB 1337 (Ward), which would amend the Information Practices Act of 1977 ("IPA," or "the

Act") and apply it to all 58 counties, 483 cities, over 1,000 school districts and county offices of education, approximately 2,200 independent special districts, and the hundreds of JPAs, regional bodies, and other public agencies.

AB 1337 raises significant questions regarding how state and local agencies can continue to operate critical safety net programs and impose severe restrictions on data sharing in ways that undermine integrated service approaches that support timely and efficient access to essential benefits for Californians.

AB 1337 ignores the myriad of privacy and confidentiality laws already in place for local governments and, instead, imposes an unclear set of provisions that create conflicts with longstanding confidentiality laws, complicate data reporting needed for accountability efforts, and endanger federal funding, among other risks. This is a costly, unnecessary change that could jeopardize essential services and harm the communities we serve: students, the unhoused, the elderly, and those on the economic margins who rely on public services for healthcare, housing, energy, and the services that comprise the social safety net.

While AB 1337 has many provisions, at its core are three new overlapping restrictions for how local agencies manage public data:

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

Amendments Do Not Address Core Concerns

The proposed amendments fail to resolve our core concerns with the bill. Even with the proposed amendments, AB 1337 continues to severely restrict how local agencies and the state can use, transfer, or report public data and subjects public agencies to significant costs and implementation challenges. These challenges would include overhaul and, likely, replacement of systems and databases used to store personal information, substantial new training and compliance costs, and interpretation questions that would undoubtedly require resolution through litigation.

Creation and maintenance of databases require considerable resources and time. For example, the California Statewide Automated Welfare System (CalSAWS) is used by all 58 counties to streamline eligibility determination, enrollment, and case management for CalWORKs, CalFresh, Medi-Cal CMSP, foster care, and other social safety net programs. The project required many years of work and resources before it could be adopted statewide[1]. AB 1337 could completely undo those efforts and require a full redesign of the system, with just a year to accomplish it and unknown impacts to actual service delivery. This is just one example of the costly and labor-intensive efforts that would be required by this bill. Countless other programs at the state and local level would require a similar rapid overhaul, compelling like changes to databases, data use agreements, bargaining agreements, policies, and general operations.

While the costs, liability, and burdensome compliance are certainly a top concern, our primary reason for opposing the bill is due to the bill's negative impacts on delivery of services by public agencies. H.R. 1 was designed to remove millions from Medi-Cal and CalFresh through the burdens of paperwork. AB 1337 would compound the consequences of that law and make it even harder for Californians to access needed services.

Complicates Data Sharing and Reporting

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

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

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

[1] CalSAWS Executive Overview

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

By requiring individuals to opt into data sharing, reporting will be biased towards those who choose to opt into sharing their data – creating unknown impacts that will make it harder to discern which populations are underrepresented in service delivery. Civil Code § 1798.24 would prohibit agencies from disclosing any data that *could* identify an individual, rather than the current standard that disclosure *would* identify an individual. This change could have a severe chilling effect on reporting outcomes of public services. Public employees could reasonably choose not to publish reports that, while designed to account for service delivery across demographic and economic strata, could place them at risk of a misdemeanor. We are concerned this provision could undermine the understanding of how agencies succeed or fail to deliver services, weakening public accountability.

Hampers Abilities to Respond to Unlawful Activity

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

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

For agencies responsible for child and family services, this change could restrict information sharing with law enforcement in ways that could endanger child safety and make it harder for those agencies to evaluate risk and safety. Social workers could be held liable with a misdemeanor or termination for attempting to ensure child safety – an outcome that is clearly not the intent of this bill, but an example of the unintended consequences created when bills are drafted without an understanding of the practical application of its language or the input of impacted local agencies.

Expands Legal Liability for Public Agencies and their Workforce

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

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

Ignores and Conflicts with Existing Privacy and Confidentiality Laws

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

Health

- The Health Insurance Portability and Accountability Act (HIPAA) and the Confidentiality of Medical Information Act (CMIA) regarding Medi-Cal beneficiaries and those receiving care at public hospitals;
- 42 CFR Part 2 for confidentiality of substance use disorder patient records;
- Welfare and Institutions Code (WIC) § 5325.1 regarding the right to privacy for persons receiving treatment for a mental illness;
- WIC § 827 regarding the right to privacy for juvenile records; and
- Penal Code § 13823.5(c)(2) regarding confidentiality of sexual assault examination records.

Social Services

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

Elections

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

Schools

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

Criminal Justice

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

Finance

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

Public Utilities

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

Libraries

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

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

Put simply, local agencies take data privacy and confidentiality seriously and comply with a network of specific privacy and confidentiality laws. AB 1337 upends this longstanding framework with a blanket policy that directly conflicts with many existing laws or creates confusion and inconsistent compliance based on how agencies are used to compliance. While the California Consumer Privacy Act expressly provides that its requirements do not apply to information governed by CMIA, AB 1337 provides an unclear acknowledgement of its conflicts with CMIA.

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

To cite another conflict, HIPAA allows covered entities to disclose protected health information without an individual's consent for purposes including treatment, payment, or health care operations[2]. AB 1337 ignores these carefully designed rules and imposes significant uncertainty as to how patient data can be shared for delivery of medical care by public hospital systems.

County child welfare and behavioral services laws restrict even acknowledging whether an individual is receiving care, unless an entity is specifically authorized by law[3]. AB 1337 establishes contrary rules that endanger child privacy by allowing for

[2] 5 C.F.R. § 164.502(a)(1)

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

the release of information upon consent and by other circumstances established in Civil Code § 1798.24.

Endangers Federal Funding

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

Imposes Expensive and Sudden Requirements on Local Agencies

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

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

Even though section 32 of the bill asserts that no reimbursement is required by the act, we believe the bill clearly mandates considerable new obligations for local agencies: compliance with the IPA, which requires significant changes to software, internal practices, and duties of local agency workforces.

To add to these challenges, the bill allows state and local agencies little time to prepare for compliance. Because the bill would take effect January 1, 2028, and because state and local agencies may not know if the bill will become law until the Governor's September 30, 2026, deadline to sign or veto bills, state and local agencies could have a little more than a year to prepare for compliance with the amended IPA. Agencies would be compelled to rapidly complete legal review, train staff, update forms, and implement new procedures for data management without

any financial resources and in the midst of the dramatic workload changes that are anticipated with implementation of H.R. 1.

Heightens fiscal pressure on public agencies
Public agencies are facing considerable cost pressure from all fronts and AB 1337 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing statutory protections for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment, growing special education program demands and health care costs. For counties, implementation of H.R. 1. is expected to result in up to $9.5 billion in new annual costs to counties once fully implemented as it fundamentally shifts certain administrative fiscal responsibilities for safety net programs to counties. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million-dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

Put simply, we do not believe the costs, burden, and risks brought by this bill are necessary for public agencies.

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

Sincerely,

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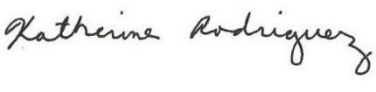

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Amer Rashid
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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Christian Kurpiewski, Chief Consultant, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Morgan Branch, Policy Consultant, Senate Republican Caucus

June 4, 2026

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

RE: Assembly Bill 1439 (Garcia) Public retirement systems: development projects: labor standards.
As amended June 2, 2026 – OPPOSE
To be heard in the Senate Committee on Labor, Public Employment and Retirement on June 10, 2026

Dear Chair Smallwood-Cuevas,

The California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (CalCities), California Association of School Business Officials (CASBO), and the Association of California School Administrators (ACSA) must respectfully oppose Assembly Bill 1439 (Garcia).

This bill would request the University of California, Berkeley, Labor Center to study the impacts of the labor standard policies that would have been imposed on investments under the prior version of AB 1439. The bill would also request the CalPERS and CalSTRS boards to provide data upon request to aid the completion of the study. Our coalition opposed the earlier version of this bill because it could have substantially limited investment options for CalSTRS, CalPERS and county retirement systems.

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 a step down a slippery slope of political interference in the retirement assets earned by California's public employees.

Aside from our concerns that the bill advances an unwise legislative proposal, we do not believe it is necessary. CalPERS is conducting a market study to evaluate the potential impacts of adopting the standards that had been proposed in AB 1439. It is not clear that there is an entity better positioned to conduct a study than the pension systems themselves: professional investment staff governed by a board accountable to public employees and employers. Requesting a duplicative analysis to be conducted by an outside entity, like the UC Labor Centers, undermines CalPERS' and CalSTRS' independence and authority to assess investment risks on behalf of their members.

The standards for investment previously outlined in AB 1439 would have established a *de facto* divestment mechanism for a broad swath of public pension investments. According to a CalPERS publication entitled Divestment is Political, CalPERS' Fiduciary Duty Is Not, forced divestments substantially limit investment options for CalPERS and county retirement systems, ultimately raising annual contributions costs for public employers, including the state, local agencies, and schools, as well as the public workforce.

Divestment makes achieving the returns needed to maintain a plan's health more challenging; it 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. For these and other reasons, we have significant concerns with legislation that mandates divestment or, in this case, consumes time and resources to study investment topics motivated by political objectives.

California's public workforce deserves the retirement benefits they have been promised. Legislative-imposed policies that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers. We do not believe this legislation is an appropriate exercise of legislative authority.

For these reasons, our organizations must respectfully oppose AB 1439. Please contact us if you have any questions.

Sincerely,

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CC: The Honorable Robert Garcia, California State Assembly
Members, Senate Committee on Labor, Public Employment and Retirement
Glenn Miles, Principal Consultant, Senate Committee on Labor, Public Employment and Retirement
Scott Seekatz, Policy Consultant, Senate Republican Caucus

June 3, 2026

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

RE: Assembly Bill 1439 (Garcia) Public retirement systems: development projects: labor standards.
As amended June 2, 2026 – OPPOSE
To be heard in the Senate Committee on Labor, Public Employment and Retirement on June 10, 2026

Dear Chair Smallwood-Cuevas,

The California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (CalCities), California Association of School Business Officials (CASBO), and the Association of California School Administrators (ACSA) must respectfully oppose Assembly Bill 1439 (Garcia). AB 1439 would needlessly consume resources of CalPERS and CalSTRS and intrudes on the plenary authority of the governing boards of those systems.

This bill would require the boards of CalPERS and CalSTRS to contract with the University of California, Berkeley, Labor Center to study the impacts of the labor standard policies that would have been imposed on investments under the prior version of AB 1439. Our coalition opposed the bill in that form because it could have substantially limited investment options for CalSTRS, CalPERS and county retirement systems.

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 a step down a slippery slope of political interference in the retirement assets earned by California's public employees.

Aside from our concerns that the bill advances an unwise legislative proposal, we do not believe it is necessary. CalPERS is conducting a market study to evaluate the potential impacts of adopting the standards that had been proposed in AB 1439. It is not clear that there is an entity better positioned to conduct a study than the pension systems themselves: professional investment staff governed by a board accountable to public employees and employers. Requiring a duplicative analysis to be conducted by an outside entity, like the UC Labor Centers, undermines CalPERS' and CalSTRS' independence and authority to assess investment risks on behalf of their members.

The standards for investment outlined in AB 1439 would have established a *de facto* divestment mechanism for a broad swath of public pension investments. According to a CalPERS publication entitled Divestment is Political, CalPERS' Fiduciary Duty Is Not found that forced divestments substantially limit investment options for CalPERS and county retirement systems, ultimately raising annual contributions costs for public employers, including the state, local agencies, and schools, as well as the public workforce.

Divestment makes achieving the returns needed to maintain a plan's health more challenging; it 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. For these and other reasons, we have significant concerns with legislation that mandates divestment or, in this case, consumes time and resources to study investment restrictions motivated by political objectives of non-public employee advocates.

California's public workforce deserves the retirement benefits they have been promised. Legislative-imposed policies that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers. We do not believe this legislation is an appropriate exercise of legislative authority or pensions system resources.

For these reasons, our organizations must respectfully oppose AB 1439. Please contact us if you have any questions.

Sincerely,

Eric Lawyer
Senior Legislative Advocate
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CC: The Honorable Robert Garcia, California State Assembly
Members, Senate Committee on Labor, Public Employment and Retirement
Glenn Miles, Principal Consultant, Senate Committee on Labor, Public Employment and Retirement
Scott Seekatz, Policy Consultant, Senate Republican Caucus

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

The Honorable Darshana Patel
California State Assembly
1021 O Street, Suite 5140,
Sacramento CA 95814

Re: AB 2179 (Patel) Workplace violence: restraining orders.
As Amended June 1, 2026 – SUPPORT

Dear Assemblymember Patel,

The California State Association of Counties (CSAC), proudly representing all 58 of the state's counties, writes to express our support for your Assembly Bill 2179, which modernizes workplace violence restraining order proceedings by expanding remote appearance options and improving electronic filing access for protective-order-related documents. In short, the bill will help to keep the public workforce and public officials safe.

California law currently allows employers, and, in certain cases, authorized collective bargaining representatives, to seek workplace violence restraining orders when an employee has suffered unlawful violence, harassment, or a credible threat of violence that could reasonably be carried out at the workplace. However, the process can still require in-person participation and paper-based steps that create unnecessary barriers — especially for employees and witnesses who may fear retaliation, lack transportation, cannot easily take time off work, or face safety concerns traveling to and from court.

AB 2179 would permit any party or witness in a workplace violence restraining order proceeding to appear remotely at the hearing. It would also ensure that courts do not charge a fee for participating remotely and would require courts to allow

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

electronic submission of filings related to these protective orders, improving timely access to the court process.

AB 2179 supports workplace safety by making restraining order proceedings more accessible and safer to navigate. By reducing practical barriers to participation, the bill can help ensure that the court receives the information it needs while minimizing disruption to work and reducing safety risks for parties and witnesses.

For these reasons, CSAC is pleased to support your AB 2179. We thank you for your leadership on this issue.

Sincerely,

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

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

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

Re: AB 2179 (Patel) Workplace violence: restraining orders.
As Amended June 1, 2026 – SUPPORT
To be heard in Senate Judiciary on June 9, 2026

Dear Chair Umberg,

The California State Association of Counties (CSAC), proudly representing all 58 of the state's counties, writes to express our support for Assembly Bill 2179 (Patel), which modernizes workplace violence restraining order proceedings by expanding remote appearance options and improving electronic filing access for protective-order-related documents. In short, the bill will help to keep the public workforce and public officials safe.

California law currently allows employers, and, in certain cases, authorized collective bargaining representatives, to seek workplace violence restraining orders when an employee has suffered unlawful violence, harassment, or a credible threat of violence that could reasonably be carried out at the workplace. However, the process can still require in-person participation and paper-based steps that create unnecessary barriers — especially for employees and witnesses who may fear retaliation, lack transportation, cannot easily take time off work, or face safety concerns traveling to and from court.

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AB 2179 supports workplace safety by making restraining order proceedings more accessible and safer to navigate. By reducing practical barriers to participation, the bill can help ensure that the court receives the information it needs while minimizing disruption to work and reducing safety risks for parties and witnesses.

For these reasons, CSAC is pleased to support AB 2179 (Patel) and respectfully requests your AYE Vote.

Sincerely,

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

CC: The Honorable Darshana Patel, Member, California State Assembly
Members and Consultants, Senate Judiciary Committee
Margie Estrada, Chief Counsel, Senate Judiciary Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

June 2, 2026

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

RE: **<u>SB 922 (Laird) Vehicles: local agency charges: use of streets or highways.</u>**
COALITION SUPPORT *(As Amended on March 11, 2026)*

Dear Chair Carrillo,

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,

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League of California Cities
Legislative Advocate
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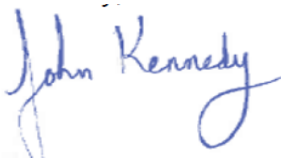

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June 2, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended May 14, 2026)*

Dear Chair Ortega:

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, Public Risk Innovation, Solutions, and Management, California Association of Recreation and Park Districts, and California County Superintendents 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 ways 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 notable and costly steps backwards from the enrolled version of SB 7, directly

implicating the concerns raised by the Governor. Specifically, 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 whenever an ADS output is primarily relied on to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. Increasing the burdens of compliance will deter local governments from using these important 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 as well as Proposition 98 dollars intended for students and classrooms.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For schools, this is a direct drain on Prop 98 funding. 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, and schools facing declining enrollment, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Further, 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.

Applying SB 947 to Public Employers May Lead to Unintended Consequences
Local governments and local 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 these 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 primarily relied on 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. Ensuring compliance with 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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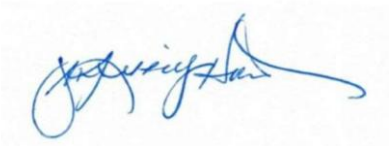

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CC:

The Honorable Jerry McNerney
Honorable Members, Assembly Labor and Employment Committee
Erin Hickey, Principal Consultant, Assembly Labor and Employment Committee
Tess Scherkenback, Consultant, Assembly Republican Caucus

June 3, 2026

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

RE: Senate Bill 951 (Reyes) – OPPOSE UNLESS AMENDED
As Amended May 14, 2026

Dear Assemblymember Ortega:

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), Public Risk Innovations, Solutions, and Management (PRISM), University of California, California Association of Recreation and Parks Districts (CARPD) and Association of California Healthcare Districts (ACHD) we must regretfully oppose Senate Bill 951 (Reyes), regarding workforce displacement or termination due to the adoption of certain technologies, unless amended to exempt local government employers.

SB 951 would establish the California Worker Technological Displacement Act, and require employers to provide at least a 60-day advanced written notice before any reduction in hours or termination caused in whole by the use of artificial intelligence (AI) or other automated technology (undefined). For employers of 100 or more employees, it would establish “first bid” rights on other positions for terminated employees. Compliance failure would cause 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. SB 951 would also subject public agencies to a $500 fine for each day of a violation and would allow any interested or uninterested party to file a report of compliance failure with the Labor Commissioner. Compounding these concerns, the bill's definition of "worker" includes independent contractors, meaning cities, counties, and special districts

would have to provide back pay and other benefits to employees of a private company 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 technology 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, our organizations have concerns regarding the likelihood of overlapping or conflicting requirements introduced by this bill that will create uncertainty and liability for local agencies.

Furthermore, SB 951's requirement that certain employers, including many public agencies, provide displaced workers with a "right of first bid" on other positions would directly conflict with long-established merit-based civil service systems and collectively bargained labor agreements that govern vast majority public-sector hiring. These systems prescribe detailed procedures for filling vacancies, including competitive examinations, minimum qualifications, seniority provisions, reemployment lists, promotional opportunities, and negotiated bumping and layoff rights. By creating a new statutory hiring preference that supersedes these established processes, SB 951 would create significant legal uncertainty and expose public employers to competing obligations under state labor laws, civil service rules, and local personnel ordinances.

While the recent amendments attempt to address collective bargaining concerns by exempting situations where the right-of-first-bid provisions would conflict with a collective bargaining agreement, the amendment does not resolve the fundamental problems created by the bill. Instead, it introduces significant legal uncertainty by requiring employers, employee organizations, and ultimately the courts to determine when a conflict exists and whether a particular negotiated provision is sufficient to displace the statutory requirements. By establishing statutory rights governing layoffs, displacement, and reemployment, SB 951 effectively removes or constrains subjects that have

traditionally been negotiated through collective bargaining. Rather than preserving local labor-management flexibility, the bill imposes a one-size-fits-all framework that may conflict with existing agreements, complicate future negotiations, and undermine carefully balanced personnel systems developed over decades through collective bargaining and civil service laws.

Finally, for employees supported by federal grant funding, including those administering critical health and human services programs, SB 951 may conflict with federal merit-system requirements that are conditions of receiving federal funds. Any erosion of merit-based hiring standards could place public agencies at risk of audit findings, compliance violations, or jeopardized federal funding streams. At a time when local governments are already facing significant fiscal and workforce challenges, SB 951 would create administrative burdens, increase litigation risk, and disrupt established personnel systems without providing clear guidance on how employers are expected to reconcile these conflicting legal obligations.

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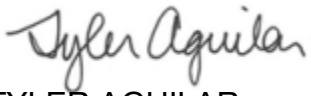

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cc: The Honorable Eloise Gomez Reyes, Member of the California State Senate
Members of the Assembly Labor and Employment Committee
Megan Lane, Chief Consultant, Assembly Labor and Employment Committee
Tess Scherkenback, Consultant, Assembly Republican Caucus

June 1, 2026

Eric Berg
Deputy Chief, Health and Research and Standards
Cal/OSHA / Division of Occupational Safety and Health
1515 Clay Street
Suite 1901
Oakland, CA 94612
Via Email to: rs@dir.ca.gov

RE: Proposed Regulations for Implementation of Workplace Violence Prevention Under Senate Bill 553 (Cortese, 2023) – April 23, 2026, Working Draft

Dear Deputy Chief Berg,

The California State Association of Counties (CSAC), Association of California School Administrators (ACSA), and California Special Districts Association (CSDA) appreciate the opportunity to provide input on the draft proposed regulations well before they are considered by the Occupational Safety and Health Standards Board (OSHSB). We extend our thanks to the staff and leadership for your efforts to make the process inclusive and transparent.

Local government agencies and local educational agencies value our workforce and take our responsibilities to protect their health and safety as an imperative duty. Due to several concerns, including the expansion of temporary restraining order (TRO) filing authority and administrative burdens that cannot be recouped through cost recovery, local governments opposed Senate Bill 553 (Cortese, 2023). Our deliberation of SB 553 yielded some changes from the original version, some of which were absolutely critical. Ensuring that some of these provisions do not return in the proposed regulations, and that the proposed regulations are workable within public agency operational requirements, remain priorities for us.

Local governments and schools have a duty to provide essential public services, and our workforce must conduct their work in a variety of environments, some of which have increased risk than others due to the nature of our work. Local governments and schools already work constantly to mitigate those hazards and take actions necessary to keep our workforce safe. We have general concerns about policies that raise legal risks for local governments that are simply trying to provide essential public services. These concerns are heightened by an environment in which we face budget crises at the state and local level, limitations in our ability to raise revenue needed to meet heightened service delivery expectations, and crushing legal liabilities brought by recently enacted legislation, leading to fiscal pressures of both legal expenses and insurance costs.

With those thoughts in mind, we share the following comments on the version of the proposed regulations dated April 23, 2026. We look forward to future opportunities to share our perspective on these regulations throughout this year and during formal rulemaking.

§3343(a)(1)
Exception 6 would apply to places of employment not accessible to the public if the employer has fewer than 10 employes at the place of employment at all times during the preceding 365 days and is in compliance with section 3203.

This adds additional qualifications not found in statute, which simply measures 10 employees "at any given time." This exception is important for public agencies that maintain small places of employment, and should be aligned with statute. Further, the note referring to total employees on payroll is vague as to how and where it is measured, potentially opening up a vastly different calculation – the note diminishes clarity and should be struck.

Additional language notes that the exception does not apply to "security services," among others. In our comments on the May 13, 2025, draft we requested additional clarity to define the meaning of security services for this purpose, as some local agencies and local educational agencies have in-house security. We reiterate that request here in connection with the April 23, 2026, draft.

§3343(b)(3)(J) and (K)

We previously addressed comments to the addition of "visibility improvements," to the list of engineering controls (§3343(b)(3)(J)). We would like to note that the legislature is presently considering a package of bills which may have the direct or indirect effect of limiting or restricting the use of workplace technologies that enhance the safety of public sector places of employment, including certain Artificial Intelligence and Automated Decision Systems, as well as certain workplace surveillance tools.[1] We are greatly concerned that, if enacted, this legislation could inhibit the use of tools to prevent workplace violence incidents and slow down response times for all types of violence under the Standard, but particularly Type 3 violence – and contradict the requirements of this definition. These concerns also extend to video monitoring and recording included at 3343(b)(3)(K), as well as other areas where technology could enhance employee safety and compliance with the regulation (e.g., §3343(b)(3)(A), (B), and (L)).

Employers will be stuck in the middle of conflicting goals in statute and regulation. We would urge the Division to take note of, and consider engagement in, that legislative conversation. If these bills pass as written, the Division would need to consider how the regulations could accommodate legislation that restricts our ability to prevent workplace violence.

§3343(b)(6)(C) & §3343(d) – Violence Incident Log

We appreciate the addition of an exception in response to the concerns we shared previously that the regulations could set up local agencies to fail by requiring them to find *all* public threats made and log them accordingly. We appreciate the adjustment to the language to account for threats made by the public at large, but fail to see why the exception should not cover the full spectrum of social media posts, not simply personal social media posts.

To that end, the note should read as follows:

> **NOTE: The employer is not responsible for texts, electronic messages, or ~~personal~~ social media that are not brought to the attention of the employer or that the employer could not otherwise be reasonably aware of.**

§3343(c)(6), §3343(f)(4), and §3343(f)(7) – Concerns with addition of authorized employee representatives and designated representatives to those who are informed about investigations

We continue to have concerns with the addition of "authorized employee representative," to §3343(c)(6). Unlike statute, the proposed regulations would require employers to inform employee representatives, in addition to employees, about the results of workplace violence investigations. We believe this addition goes outside of the scope of the law and have

[1] AB 1331 (Elhawary) would place restrictions on workplace surveillance tools generally, and specifically provides that a workplace surveillance tool in an employee-only breakroom or cafeteria shall not use generative artificial intelligence enabled video surveillance. See also AB 1883 (Bryan), which seeks to place restrictions on workplace surveillance technologies, including facial recognition technology; and, SB 947 (McNerney), which would limit the use of AI and automated decision systems to discipline or terminate employees.

concerns that it could challenge the ability for employers to maintain confidentiality in reporting on workplace violence investigations.

Further, we are concerned by the addition "designated representative" to §3343(f)(4), and §3343(f)(7). This term does not appear in statute and is defined to be broader than "authorized employee representative," potentially exposing sensitive information to third parties.

We believe this concern is best addressed by striking the addition of reporting results of investigations and corrective actions to an "authorized employee representative" from §3343(c)(6)(B) and the requirement to provide information to "designated representatives," in §3343(f)(4) and §3343(f)(7). Employee representatives are already well engaged in the process to update the plans to reflect new or growing threats to workplace safety and incident logs are available for review to meet this purpose.

In light of these requested edits, the "designated representative" definition in §3343(b)(2) does not serve a purpose and should be struck.

<u>§3343(c)(9) – Changes needed to limit liability to public employers who are not aware of a hazard</u>
Section 6401.9(c)(2)(I) requires employers to include in their workplace violence prevention plan procedures to, among other things, inspect workplace violence hazards whenever the employer is "made aware," of a new or previously unrecognized hazard. The proposed regulations in §3343(c)(9) lack any similar language that would require an employer to have been aware of a new hazard and, instead, requires inspections when changes to the place of employment or job duties create new workplace violence hazards ***and*** whenever the employer is made aware of a new or previously unrecognized hazard.

Without the critical language that employers must be "made aware," of a new hazard, we worry that this section sets public employers up for failure to be aware of unknown hazards.

<u>Definitions of Workplace Violence Hazards – §3343(b)(10) and Work Practice Controls §3343(b)(9).</u>
Serving the public and delivering essential services inherently requires public employees to conduct their work in the presence of many of the factors included in this section. The nature of their work may require employees to conduct their work alone, in the presence of the public, and late at night or early in the morning. Further, many public employers are required by law to have their worksites provide open access to the public and many public employers go above and beyond those requirements out of a duty to ensure their work is open to public scrutiny.

We appreciate the amendment to clarify that the items listed are factors to consider when identifying workplace violence hazards, rather than identifying them as examples of hazards. The edit is helpful to avoid a situation where public employers are compelled to correct hazards that are inherent to public service. The amendments in the new §3343(b) establish a much more reasonable standard: that pubic employers consider those conditions as aspects of a workplace hazard.

We continue to have concerns regarding the inclusion of staffing as a "work practice control." This concern extends to security staffing. We believe this addition goes well beyond the categories of work practice controls established in statute and creates an unworkable obligation for public agencies. Public agencies are required to provide essential public services and deliver state mandated programs with minimal resources and cannot easily reassign employees due to memorandums of understanding with employees.

Furthermore, there is no definition in the regulations about what may be appropriate staffing, aside from a requirement that it be sufficient to maintain order in the facility and respond to workplace violence incidents in a timely manner,

leading public employers to navigate an undefined, unclear, and expensive mandate that would add to the workforce recruitment and retention challenges faced by all levels of government in California.

We believe these concerns are best addressed by removing "and staffing," from the first sentence in the §3343(b)(9) introductory paragraph, "appropriate staffing levels," from §3343(b)(9)(A), and "provision of dedicated security personnel" from §3343(b)(9)(B).

For the same reasons, we believe these concerns can be addressed by removing "inadequate staffing levels" from §3343(b)(10)(H) and "lack of or inadequate security staffing" from §3343(b)(10)(I).

§3343(c)(11)(C)
Trauma counseling was included in earlier versions of SB 553 but was removed and not included in the chaptered version of the bill. To the extent a workplace violence incident gives rise to a claim covered by workers' compensation, the workers' compensation system is already adequate to provide appropriate treatment. Therefore §3343(c)(11)(C) should be struck from the draft regulation.

Further, the April 23, 2026, draft's deletion of "upon request" raises administrative and implementation concerns. Given the broad scope of the regulation, and the fact that trauma counseling is not required by the statute, a requirement to affirmatively offer trauma counseling is excessive, may not be appropriate in all instances, and raises the potential for disputes and litigation over whether the offer was made.

§3343(c)(11)(G)
Any post-incident response should naturally rely on discussing the incident with employees involved and using their observations to evaluate workplace controls and opportunities to improve workplace violence mitigation. We note one pending bill that could severely restrict the ability of employers to conduct this post-incident investigation: AB 1564 (Ahrens). AB 1564 would prohibit employers from questioning employees or employee representatives about certain communications made in confidence between the employee and their representative.

Should this bill be signed into law, this section would need to be reconsidered in order to avoid compelling employers from violating this law in response to requirements established in these regulations.

§3343(c)(11) Exception
Further, the April 23, 2026, draft deletes entirely the exception to §3343(c)(11)(D)-(G) for type 2 workplace violent incidents that are repetitive, subject to certain requirements. This exception should remain in place as it is relevant in education settings, particularly for students in special education where a student may manifest a disability in verbal or physical ways. In these instances, relief from certain aspects of the regulation is appropriate. We therefore request restoration of the exception without the "involuntary" and "unintentional" qualifiers which undermined the purpose of the prior exception.

§3343(e)(1)(F)
A previous draft required, in connection with training, that there be an opportunity for interactive questions and answers with a person knowledgeable about the employer's workplace violence prevention plan. The April 23, 2026, draft requires that training not given in person shall provide for interactive questions to be answered within one business day by a person knowledgeable about the employer's workplace violence prevention plan. Smaller agencies and departments may struggle to comply with such a short turnaround time. SB 553 is silent on timeframes for response, and requiring an arbitrary timeframe in this regulation does not account for the variety and complexity of questions that may be received. We request that the timeframe be struck, consistent with statute, or be limited to a "timely" response.

§3343(f)(6)
This section would require agencies to provide personal identifying information to the division upon request. We note that pending legislation, AB 1337 (Ward), would make this action illegal, as the sharing of data would not "further the purpose," for which the data were collected. Should that law take effect, this section would need to be reconsidered and amended to avoid compelling agencies to violate the law.

§3343(f)(7)
We welcome the April 23. 2026, draft's addition of permission for the employer to redact information that may reveal personal identifying information from the records to be made available under §3343(f)(7). However, we request that the exception for training records be struck. Protecting the full scope of PII from disclosure under §3343(f)(7) protects the privacy of employees.

Thank you again for the opportunity to provide comments on the draft proposed regulations. We appreciate the efforts of Cal/OSHA and its staff to solicit the input of impacted employers and hope that our comments help shape regulations that ensure our workers are safe without exposing public agencies to unnecessary administrative burdens or legal risk.

Sincerely,

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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ABANDONED CEMETERIES REPORT

Senate Bill 777, Richardson, Chapter 658, Statutes of 2025

Gina Sanchez, Bureau Chief

June 1, 2026

CFB
CEMETERY & FUNERAL BUREAU

CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS

Introduction

The Cemetery and Funeral Bureau (Bureau) respectfully submits this report to the Legislature pursuant to SB 777 (Richardson, Chapter 658, Statues of 2025) Abandoned cemeteries: report.

SB 777 amended Business and Professions Code (BPC) section 7612.12 related to the requirements of the abandoned cemeteries workgroup by identifying specific participants and advancing the timeline to convene the workgroup and submit the report. **SB 777 specifically required the workgroup to discuss options for the continued care of abandoned cemeteries, including the possibility of requiring counties to assume responsibility for maintenance, irrigation, public works, and burial services for those located within their boundaries.** The workgroup was required to meet prior to March 1, 2026, and the Bureau is required to provide its report to the Legislature no later than June 1, 2026, instead of the previous January 1, 2028, date.

This BPC section was originally added to the Cemetery and Funeral Act (Act) through the Bureau's Sunset bill (AB 3254 (Berman, Chapter 589, Statutes of 2024)) in response to abandoned cemetery issues identified in the Bureau's 2024 Sunset Review Report. Current law[1] gives counties permissive authority to take action to protect the health and safety of the public and perform maintenance on unlicensed cemeteries located on private property. However, it does not *mandate* the counties to perform maintenance of abandoned cemeteries and does not provide a sustainable or equitable long-term solution for counties to take permanent responsibility for the continued care of an abandoned cemetery.

The SB 777 Workgroup in-person meeting was held on January 21, 2026, at the Department of Consumer Affairs in Sacramento. During the workgroup meeting, members noted a practical risk of counties assuming the responsibility of maintenance of abandoned cemeteries. If a county invests significant resources to maintain a neglected private cemetery, the property's value may increase, allowing the private owner to sell and keep the benefit without reimbursing the county. This creates an illogical incentive for property owners to defer maintenance and shifts costs to the public.

Local governments are neither designed nor resourced to provide ongoing upkeep for privately owned property. Clear statutory direction is needed to

[1] Business and Professions Code sections 7614 and 7653.9

avoid unintended fiscal burdens on counties and to ensure private owners remain accountable for maintenance obligations.

This report will focus on those cemeteries which are no longer licensed by the Cemetery and Funeral Bureau, whose endowment care fund (also known as a perpetual fund or maintenance fund) has been conserved by the Bureau, and whose owners have abandoned both the cemetery and the property.

Background

The Bureau regulates approximately 190 privately owned, licensed cemeteries. Public cemeteries, veteran or military cemeteries, church owned or religious cemeteries, and small cemeteries established before 1939 without endowment care funds fall outside of Bureau oversight. The Bureau regulates cemeteries by ensuring compliance with State laws and regulations and in turn protects consumers from unscrupulous operators. Once a license has been cancelled, surrendered or revoked, the Bureau's authority becomes limited to solely protecting the cemetery's endowment care trust fund (ECF) until another licensed operator takes over.

Privately licensed cemeteries are mandated by the Act to hold an ECF. This trust is consumer-funded by a portion of every sale for a space in the cemetery, and the purpose of the ECF is solely for perpetual care and maintenance of the cemetery grounds. However, without anyone overseeing the property itself, maintenance is not performed, and the funds are not fully utilized. In order to protect the fund without a licensed entity operating the cemetery, pursuant to BPC section 7613.11, the Bureau conserves the ECF upon cancellation, surrender or revocation of the license.

The Bureau believes that the legislative intent behind requiring Bureau conservatorship was to ensure that ECFs remain protected and properly managed during periods when there is no licensed operator. Once a cemetery license is cancelled, surrendered or revoked, the Bureau's authority otherwise ceases, leaving the trust fund vulnerable to mismanagement without intervention.

The Bureau is the only entity with regulatory oversight and authority over ECFs, therefore conservatorship ensures continuity, preserves the integrity of trust, and protects the public interest until a new licensee is approved and full regulatory oversight can be restored.

Many smaller abandoned cemeteries have insufficient balances in their ECF, and limited burial space, creating financial instability. This financial instability also makes it an unattractive business venture for most buyers or investors, and when combined with a property that is neglected and burdened with unfulfilled burial

contracts, tax liability and private liabilities, the property becomes a valueless investment. Even with a well-funded ECF, there is no guarantee a private individual or business will oversee this property in perpetuity.

The two permissive laws currently in statute are:

- BPC section 7653.9: Allows the court to appoint a temporary manager or allows counties to assume care. However, the law is permissive, it lacks clarity on which entity petitions the court, and its intent was to provide only short-term solutions.

- BPC section 7614: Grants cities and counties authority to act when public health or safety is threatened. This statute does not mandate regular upkeep, only reactive measures, and is not cost effective for long-term cemetery preservation.

Both laws only provide temporary relief, as the private property owner retains title ownership of the property. Specific to a court appointment for a temporary cemetery manager, a qualified licensee must be willing to assume the role, and either the manager or other qualified entity, such as a local authority, must be prepared to cover the associated court costs. As noted by a workgroup representative during the meeting, this process is often lengthy, subject to the courts calendar, and financially burdensome which many local authorities cannot sustain. The statute provides that compensation for the licensee is determined by the presiding judge, who must consider the overall health and available income of the ECF. Most small endowment care funds and cemeteries lack sufficient resources to provide compensation for temporary managers, resulting in an appointment being filled on a volunteer basis. The property owner also has a right to due process and may testify on their own behalf, meaning a petition for appointment is not guaranteed to be granted.

Regardless of whether the property is a licensed cemetery, the property title remains with the owner of the property. The Bureau's authority to require a property to be maintained according to licensing requirements is removed once the Bureau no longer has oversight over the cemetery due to the surrender or revocation of its license. When lack of licensure leads to abandonment of the cemetery by the property owner, statutory frameworks provide limited, permissive authority for local government to intervene, with the result being there is no incentive for counties or cities to step in and assume maintenance of the private property. Further, the law provides that after five years of delinquent taxes, the county can auction the property, but five years is a significant time to wait, and it is unlikely that there will be a buyer. Additionally, taking ownership of a property for back taxes is costly and requires extensive

legal steps, notifications and staff resources, which may not be recovered with the sale of the property.

Most importantly, there is also nothing in current law that prevents a property owner from closing a cemetery after their license has been cancelled, surrendered or revoked, leaving families and communities without recourse. These closures create profound and lasting impacts including restricting access to loved one's graves, unsafe grounds, and the loss of community remembrance as many of these properties have historic significance.

This leaves communities upset, frustrated and uncertain where to turn without clear responsibility for ongoing care and access. Thereby creating risks to public health, safety, and the preservation of a community's heritage.

The overall statutory structure of cemetery regulation in California reveals the challenge that cemeteries are forever, permanent community fixtures, but the private corporations that operate them may not.

SB 777 Workgroup

Once SB 777 was signed into law, the Bureau immediately began establishing workgroup representatives. To ensure the Bureau had the perspective of the public, the Bureau held a public meeting on December 16, 2025. This meeting was held as part of the broader stakeholder engagement envisioned by SB 777 to ensure the workgroup received input from public stakeholders.

The majority of the comments at the public meeting came from consumers expressing frustration over the deteriorating conditions at unlicensed cemetery grounds where their loved ones are buried. One commenter urged granting the Bureau authority to remove a current manager and appoint a temporary manager until a permanent solution is established. Concerns were also raised about the Bureau's limited ability to disburse ECF income to entities other than a city, county, or licensee, as well as questions about liability if someone is injured at an unlicensed cemetery. Consumers also worried about the status of their preneed contracts and whether burials, particularly those requiring short timeframes for religious reasons, could still occur in an abandoned cemetery. Additional commenters asked the Bureau to better identify cemeteries at risk of abandonment and to clarify what tools are needed to prevent such situations. A commenter concluded by encouraging the public to continue contacting their local Senators and Assembly Members to emphasize the seriousness of the issue and the need for legislative action.

These comments provided the workgroup members with a clear public perspective on the issues and primary concerns.

Shortly following the public meeting, the Bureau hosted its in-person workgroup meeting on January 21, 2026. The stakeholders and entities represented at the meeting included:

- Senate Business, Professions and Economic Development Committee
- Senate Local Government Committee
- Assembly Committee on Business and Professions
- Assembly Local Government Committee
- County of Marin Office of the County Executive
- California State of Association of Counties
- Rural County Representatives of California
- Urban Counties of California
- California Association of Public Cemeteries
- League of California Cities
- Cemetery Industry Licensees
- Cemetery and Mortuary Association of California
- California Association of Local Agency Formation Commissions
- California Special Districts Association
- Deputy City Attorney's Office, City of Stockton

The workgroup discussion centered around the growing challenge of privately owned cemeteries that can no longer sustain operations and ultimately are no longer licensed by the Bureau. One member of the workgroup suggested that all cemeteries in California should be included in the group's discussions, rather than limiting the conversation to private cemeteries under the Bureau's authority. However, because the Bureau's jurisdiction extends only to licensed private cemeteries, the workgroup ultimately focused its discussions and recommendations on private cemeteries.

Participants reviewed the existing regulatory structure, noting that the Bureau's authority is limited primarily to licensing and compliance of licensees. Once a cemetery becomes financially unstable or ceases operations, the Bureau has few tools to intervene and incentivize maintenance and fulfillment of contracts. The Bureau's enforcement authority lies in its ability to pursue administrative action against the license. In most cases, the Bureau will seek to place a licensee on probation to bring them into compliance with regulatory requirements. Revocation of the license is uncommon, as many licensees opt to cancel their license or will stipulate a surrender of the license during the administrative proceedings.

The overall discussion raised a wide range of financial, legal, and operational issues, along with potential pathways for reform as outlined below. While no single solution emerged as definitive, participants emphasized the need for a

clear statutory definition of abandonment as the foundational step for any future framework.

The workgroup identified three main areas of focus to aid in the continued care of abandoned cemeteries:

- Defining abandonment
- Title transfer to a new entity
- Ongoing funding for maintenance, access, and burials for those who have already purchased plots

There was significant discussion regarding the prevention of abandonment and identifying cemeteries that are close to abandonment. Those discussions are summarized at the end of this report although not required or requested by the Legislature to be included in this report.

Definition of Abandonment

The workgroup agreed that defining abandonment is a critical first step. Rather than proposing a specific statutory definition, the workgroup recommends that the Legislature establish clear, measurable triggering events to define abandonment in statute. The Legislature may want to consider if abandonment should be triggered by a single mandatory event or a combination of events.

Triggering events for consideration include, but are not limited to:

- No certificate of authority (cemetery license has been revoked or surrendered) for a defined period (mandatory)
- The Bureau has conserved the cemetery's ECF (mandatory)
- No new sales for a defined period
- No interments for a defined period
- Little or no remaining inventory or cemetery plots
- Documented, significant maintenance failures, evidenced by one or more of the following (at least one should be mandatory):
    - Bureau citations or disciplinary actions for maintenance deficiencies or ECF mismanagement
    - Citations or notices from local authorities
    - Property tax liens
    - Maintenance performed by local authorities to protect public health, safety, or welfare
    - Limited or no access for families and visitors
    - Voluntary abandonment of the property by the property owner

- This could be a stand-alone trigger that would trigger abandonment.

Once statutory abandonment triggers are met, a governmental entity must formally declare the property abandoned and provide the owner notice and an opportunity for hearing and appeal. The declaring entity should also be responsible for pursuing title transfer, though the appropriate recipient of title remains a separate issue.

Title Transfer

The workgroup discussed in depth how title can be transferred to another entity once the cemetery property has been deemed abandoned. Currently, there is a process for a local authority to take control over title of a piece of private property for eminent domain[2], or sell a private piece of property due to overdue and unpaid property taxes for a certain time period.

There was discussion that both processes are complex and can take several years to complete. A county using eminent domain is a costly and burdensome process involving significant legal reviews, appraisals, negotiations, and potential court proceedings. Similarly, taking a property to auction for back taxes is also resource intensive, requiring significant staff time, legal coordination, and administrative resources. Counties must conduct detailed research, issue multiple notices, follow strict statutory procedures, and manage the logistics of the sale, prior to recovering any revenue—if the sale covers the debt at all.

Both processes demand considerable time and effort, diverting limited county resources from other essential community services.

There was consensus that once a cemetery has been designated abandoned, the title transfer should be "quick and easy." The property owner will have received ample notice that the property will be deemed abandoned, so due process is met. The Legislature could declare in statute that if certain notices are provided and opportunities to correct deficiencies are failed, the property is deemed abandoned and the steps taken will have satisfied due process.

Once abandonment has been determined and the title has been transferred to a local governmental entity, a due diligent search should be made to find a private entity to continue care of, and access to, the cemetery leaving local government as a "last resort". There was discussion that an incentive for a private entity to step forward and assume title and care of an abandoned cemetery would likely be necessary.

[2] Code of Civil Procedure sections 1230.010 - 1230.070 Eminent Domain Law

Proposed incentive options:

- Liability Protections
    - Any new oversight, whether local, state, or private, would need certain liability protections for actions performed by previous owners.
    - There should be a "warm-up period" where new oversight is protected from liability while the property is returned to a safe condition.
    - Lasting protections for missing paperwork or contracts should be provided.

- Property taxes
    - Two proposals were raised, however in both suggestions, the new private owner should be absolved of paying delinquent property taxes:
        - Delinquent property taxes should be automatically forgiven
        - the previous property owner should continue to hold liability for these delinquent taxes

Two possible non-governmental entities were discussed that may be interested in owning and caring for an abandoned cemetery property -- a Bureau licensee or a non-profit organization. The workgroup agreed that after declaring abandonment and the initial title transfer has been complete, all other options for private ownership should be explored prior to any permanent governmental oversight. Along with the above incentives, the below identifies additional incentives related to private entities:

- Bureau Licensee
    - Licensed abandoned cemetery owners could have a set time frame or 'warm-up period' (five years was suggested) to gain compliance with the minimum maintenance standards required by the Act[3].
    - The Act may be amended to allow the ECF report to be submitted to the Bureau every three or five years instead of annually for cemeteries that were declared abandoned[4].
    - Tax credits could be provided that could be shared with profit-making businesses under the control of the new owner. Note, this will not provide benefit to a non-profit entity.

[3] Although 'relaxed' maintenance standards were also discussed, the Bureau has a robust and inclusive set of standards in Title 16 California Code of Regulations section 2333 and a timeframe for compliance was thought a better idea

[4] The Bureau recommends specific criteria be met to maintain less frequent reporting of an ECF

- Non-licensee Non-profit organization
    - A non-exempt[5] non-profit entity should be able to take control and ownership of the property.
    - This entity would be responsible for maintaining the property and working with Bureau licensees to perform burials for already sold graves.
    - Amend the Act to allow disbursements of the ECF to a recognized non-profit organization who owns and maintains an abandoned cemetery.
    - No new sales for spaces could be made, as they would need to be licensed.
    - This discussion included suggesting that these entities who solely provide maintenance be licensed and suggested a new Bureau license type 'cemetery maintenance license'[6]
        - The requirements for licensure were not discussed (i.e. application and fee, renewal, documentation and permits required, the requirement of a manager, ECF requirements, enforcement guidelines).

Perpetual Ownership

While the focus of the workgroup members was on facilitating private takeovers, the workgroup also considered long-term public stewardship, including requiring counties to assume responsibility when necessary.

Public entities that could take over ownership and continued care included:

- A public entity, such as a Joint Powers Authority (JPA), taking title of abandoned cemeteries and providing ongoing care and public access
- Local city or county entity
- Expanding the boundaries of the nearest public cemetery district to include the property or establish a new cemetery district[7]
- Creating a new state-wide entity similar to a JPA

The Bureau's Act could also be amended to include that the governmental entity assuming title would receive the ECF from the Bureau. If one entity is overseeing multiple cemeteries, it was discussed the governmental entity be permitted to commingle ECFs to improve investment returns and increase the funds available for maintenance, subject to transparency and fair allocation

[5] Excluded entities from the Act BPC section 7612.2

[6] A Certificate of Authority is the statutory name for a cemetery license. The Bureau recommends any new license type name be something similar

[7] Public Cemetery District Laws: Health and Safety Code sections 9000- 9093

rules. However, the Bureau noted that commingling trust funds would eliminate the option of future separation of funds if ownership changed.

Ongoing Funding

Once title has been transferred to a governmental entity for perpetual ownership, ongoing funding remains a key concern. Options discussed included:

- Declaring the property a pioneer memorial cemetery and limiting care to the available income in the ECF
- Seeking State appropriations for additional support
- Requiring consumers to pay local providers for burial services[8] (e.g., opening/closing graves)
- Allowing the governmental entity to contract for burial services, with costs passed to consumers
- Leaving it to the governmental entity to decide whether to sell new plots

Existing public cemetery districts are encouraged to absorb abandoned cemeteries when feasible. With established ECFs and potential plot sales, taxpayer impact may be minimal.

However, California's 256 cemetery districts face their own constraints, and statutory updates may also be needed. For example, the California Association of Public Cemeteries has identified recommended legislative changes in their brochure titled *What you should know about CA Public Cemetery Districts*.

Prevention

The workgroup recommended measures to prevent abandonment and promote early intervention. Some of these proposals have already been discussed in this report.

Options recommended include:

- Require the Bureau's endowment care sufficiency study to align with Sunset Review cycles and implement recommended rates promptly.
- Create disincentives for abandonment, such as loss of title, continued liability for unpaid property taxes, and potential loss of other Bureau license types.
- Establish a notification system to alert qualified operators, nonprofits, and local governments when a cemetery is declared abandoned or on the verge of abandonment.
- Allow the Bureau limited authority to adjust endowment care minimum deposit rates within a statutory range.

[8] This is already standard practice for burials in unlicensed cemeteries

- The Bureau should review its endowment care laws as they may need updating.

Conclusion

Unlicensed and abandoned cemeteries present complex challenges requiring coordination and strong partnerships among the Bureau, local authorities, and communities statewide.

In coordination with the SB 777 Workgroup, the Bureau recommends:

- Advancing prevention strategies in partnership with licensees, local governments, and the Legislature to reduce the risk of cemetery abandonment.
- Continuing to conserve and protect the ECFs and pursue legislative authority to allow income disbursement to qualified entities, such as non-profits.
- Revisions to the law to authorize local governmental entities to formally declare abandonment.
- Releasing the ECF to the local authority if no licensee or nonprofit assumes ownership, making the local entity responsible for ongoing care and prepaid burial obligations.

The Bureau remains committed to maintaining close oversight of its licensed cemeteries and ensuring that local authorities are promptly informed if any are close to or become abandoned within their communities. The Bureau looks forward to a continued partnership with the local authorities as we work together on implementing any legislative proposals that result from the findings of this report.

While this is a challenging and complex issue, the workgroup's efforts have been instrumental in identifying key steps needed to support the continued access and care of abandoned cemetery properties. The Bureau is grateful for the workgroup's time and concern for this very important issue and is committed to continuing these conversations with workgroup members, interested parties, and the Legislature.

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

June 5, 2026

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

RE: AB 1602 (B. Rubio) Foster youth: disaster aid assistance.
As Introduced January 16, 2026 – SUPPORT
Set for Hearing in Senate Human Services Committee on June 15, 2026

Dear Senator Becker:

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

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,

Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Blanca Rubio, Member, California State Assembly
Honorable Members and Consultants, Senate Human Services Committee
Spencer Winkle, Consultant, Senate Republican Caucus

June 2, 2026

The Honorable Matt Haney
Chair, Assembly Housing and Community Development Committee
1021 O Street, Suite 5740
Sacramento, CA 95814

Re: **SB 802 (Ashby): Housing finance and development: Sacramento Area Housing and Homelessness Agency**
As amended 6/1/26 – OPPOSE
Set for hearing 6/10/26 – Assembly Housing and Community Development Committee

Dear Assembly Member Haney:

On behalf of the Urban Counties of California (UCC) and the California State Association of Counties (CSAC), we write in respectful opposition to Senate Bill 802, Senator Angelique Ashby's measure that would consolidate regional housing and homelessness programs and redirect local agencies' funding for purposes of providing regional housing and homelessness services. This measure, regrettably, bypasses local decision-making for purposes of consolidating local resources without ensuring equitable, effective, and timely allocation of such resources to the contributing entities; further, we believe that this concept sets a new and troubling precedent for legislating local collaboration without a specific request from participating entities. Counties – including the County of Sacramento – are capable of participating in collaborative discussions with their local city and Continuum of Care (CoC) colleagues and their duly elected boards of supervisors are directly accountable to their constituents without the need for additional directives from the Legislature.

SB 802 dramatically restructures governance, funding, and program delivery in the County with a subset of the cities therein in a manner that will likely be disruptive to existing efforts on affordable housing and homelessness programs. Transferring coordinated entry system responsibilities to the new agency, which are required of the Continuum of Care under federal regulations, introduces significant uncertainty for how the County and affected cities will carry out homelessness response in compliance with federal law under SB 802. Existing contractual agreements with the State of California would potentially be put at risk for those programs for which the County and City of Sacramento receive direct allocations of funding that SB 802 would require to be transferred to the new agency. This further undermines program delivery by removing the opportunity to consolidate resources from multiple funding sources, including those not available to the new agency. The ability to leverage funding from a variety of sources is often what allows these types of projects and programs to come to fruition.

SB 802 also takes the unprecedented step of requiring the redirection of locally imposed fees that have been enacted and collected by the County and City of Sacramento in a manner that undermines the connection between locally enacted fees and the services provided by that local entity. This language would also give authority over these funds to a regional entity that would be

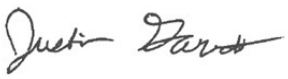
super-majority controlled by the representatives of *other* jurisdictions. For instance, in-lieu affordable housing fees generated in unincorporated Sacramento County would be subject to the control of a nine-member Board that only includes three supervisors. We believe this concept potentially violates constitutional requirements for locally imposed fees, as well as the municipal powers of charter jurisdictions. These provisions alone are indicative of the challenges that SB 802 would pose in the region.

Recent amendments that subject some jurisdictions' revenue to expenditure by the new agency while others' remain with their governing body suggest that the goal of SB 802 – to streamline and advance countywide housing and homelessness programs – is a complex one that requires mutual trust and understanding of such goals, a commitment to work in partnership, and creative expertise to maximize community impact. If the new amendments suggest a lack of interest in investing in such strategies by some entities, the goal of the bill is undermined. Further, if such parties then are able to direct resources that were provided to other jurisdictions, the bill reflects a fundamental unfairness to participating entities and the communities they serve.

Counties are deeply engaged in collaborative efforts with their city partners, the nonprofit sector, and philanthropic organizations to do all we can to assist those who experience homelessness in their communities. Measures like SB 802 should only be considered at the request of local jurisdictions and after extensive conversations among stakeholders that establish the purpose, governance, and funding of such a model. As a result, we are respectfully opposed to SB 802.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California



Justin Garrett
Senior Legislative Advocate
California State Association of Counties

cc: Members and Consultants, Assembly Housing and Community Development Committee
The Honorable Angelique Ashby, California State Senate
Sacramento County Board of Supervisors

June 3, 2026

To: The Honorable Monique Limón
President pro Tempore, California Senate

The Honorable Robert Rivas
Speaker, California State Assembly

The Honorable John Laird
Chair, Senate Budget and Fiscal Review Committee

The Honorable Jesse Gabriel
Chair, Assembly Budget Committee

RE: Maintaining Coverage for Vulnerable Californians: Alternative to Indigent Care Funding – Adopt Assembly Budget Plan

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), County Health Executives Association of California (CHEAC), County Welfare Directors Association of California (CWDA), County Behavioral Health Directors Association of California (CBHDA), the Service Employees International Union-California (SEIU California), California Black Health Network (CBHN), and the National Health Law Program (NHeLP) write to request the Legislature adopt the Assembly's budget plan to create a state funded, emergency-only benefit for individuals denied Medi-Cal due to work requirements.

California has been a national leader in reducing the uninsured rate and expanding access to care following implementation of the Affordable Care Act. However, provisions in H.R. 1 threaten

to reverse this progress. These changes put coverage at risk for more than one million Californians and will significantly increase the number of individuals who may turn to county indigent care programs which lack the resources to absorb this demand.

Counties serve as providers of last resort, delivering basic, often time-limited, medical care under their indigent care obligations. As Medi-Cal and Covered California expanded coverage, the state enacted AB 85 (Chapter 24, Statutes of 2013), which reduced available 1991 health realignment funding by slowing revenue growth and redirecting substantial funding to offset General Fund costs. As a result, counties do not have the financial capacity to respond to a large-scale shift of newly uninsured residents without additional support.

As an alternative to the state funding county costs to provide indigent care to those losing Medi-Cal coverage due to H.R. 1 community engagement requirements, we respectfully request that the Legislature adopt the Assembly's budget plan to establish a limited, emergency-only Medi-Cal benefit for two years. Consumer and labor advocates signing on do so with the clear understanding that their support does not undermine their recommendations to also oppose Medi-Cal cuts and the UIS and/or humanitarian-related budget recommendations/actions that other statewide coalitions have put forward.

This approach to provide state funded, emergency only Medi-Cal would:

- Ensure access to critical, life-saving care and stabilization services.
- Keeps people connected to the county eligibility systems allowing for more streamlined transition back to full scope Medi-Cal should ACA expansion individuals come back into HR.1 compliance.
- Prevent individuals from becoming fully uninsured and immediately shifting into unprepared county indigent care systems.
- Allow the state to more easily access allowed federal funding when individuals are admitted for in-patient emergency services, which provides an exemption from H.R. 1 work requirements.
- Provide the State with a two-year stabilization period to assess the real-world impacts of H.R. 1 and develop longer-term policy solutions.

Rather than allowing individuals to "fall off" Medi-Cal entirely, this limited benefit would maintain a basic coverage floor while avoiding the costly and complex need to rebuild indigent care infrastructure.

Sincerely,

Brendan McCarthy, Sr. 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)

Michelle Doty Cabrera, Executive Director
County Behavioral Health Directors Association of California (CBHDA)

Carlos Marquez, III, Executive Director
County Welfare Directors Association of California (CWDA)

Beth Malinowski
Government Relations Advocate
SEIU California

Rhonda Smith
Executive Director
California Black Health Network

Kim Lewis
Director of California Policy
National Health Law Program

cc: Honorable Members, Senate Budget and Fiscal Review Committee
Honorable Members, Assembly Budget Committee
Joe Stephenshaw, Director, California Department of Finance
Kim Johnson, Secretary, California Health and Human Services Agency
Michelle Baass, Director, California Department of Health Care Services
Erica Pan, Director and State Public Health Officer, California Department of Public Health
Richard Figueroa, Office of Governor Gavin Newsom
Paula Villescaz, Office of Governor Gavin Newsom
Marjorie Swartz, Office of the Senate President pro Tempore
Rosielyn Pulmano, Office of the Assembly Speaker
Elisa Wynne, Senate Budget & Fiscal Review Committee
Scott Ogus, Senate Budget & Fiscal Review Committee
Christian Griffith, Assembly Budget Committee
Patrick Le, Assembly Budget Committee
Kirk Feely, Senate Republican Caucus
Anthony Archie, Senate Republican Caucus
Joe Shinstock, Assembly Republican Caucus
Eric Dietz, Assembly Republican Caucus
Jason Constantouros, Legislative Analyst's Office
Will Owen, Legislative Analyst's Office

June 4, 2026

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

RE: AB 1294 (Haney) Planning and Zoning: Housing Development: Standardized Application Form.
OPPOSE UNLESS AMEND *(As of 4/28/26)*

Dear Chair Durazo,

The League of California Cities (Cal Cities), the Rural County Representatives of California (RCRC), the Urban Counties of California (UCC) and the California State Association of Counties (CSAC) **continue to have a position of "oppose unless amended"** on **AB 1294 (Haney)** which would prohibit a local agency from collecting information necessary to determine if a project is consistent with the local agency's development standards. Even with recent amendments, AB 1294 would prevent local governments from fully understanding the impacts of proposed projects on public facilities and services, a key step in determining how best to provide necessary resources, infrastructure, and services to support the future residents of new developments in the local jurisdiction. The Housing Accountability Act allows a local agency to subject a project to its "ordinances, policies, and standards," but AB 1294 does not allow the local agency to request information to make that determination.

The Permit Streamlining Act requires each city and county to compile a list detailing the information required for a housing development project application and post it on its website. Within thirty calendar days of receiving an application, a city or county must determine whether the application is complete. An application is complete if it includes all the items on the list. No new information can be required of the applicant after the application is deemed complete. AB 1294 (Haney) places significant and serious limitations on the items that can be on a city or county's list.

AB 1294 (Haney) directs the Department of Housing and Community Development (HCD) to adopt a standardized application form that all cities and counties must use unless the local jurisdiction adopts its own templates and forms. A standardized housing application might move the application forward. However, the application itself must include sufficient information – such as the information excluded by Government Code Section 65941.2(b)(3) and (4) of the bill to allow a city or county to evaluate the proposed housing project for compliance with "ordinances, policies, and standards," and with the design and improvement requirements of the Subdivision Map Act.
.

Cal Cities, RCRC, UCC, and CSAC support efforts to address the housing supply and affordability crisis that is gripping many regions of the state. These solutions include streamlining the housing approval process, creating a new state and local financial partnership to fund affordable housing and infrastructure projects, and consolidating important housing program grant applications. Unfortunately, by limiting information that can be considered during the entitlement process, AB 1294 will hamper the ability of local governments to ensure that housing projects meet the needs of residents and comply with important local requirements.

For these reasons, we must **regretfully must take a position of oppose unless amended AB 1294 (Haney)**. We appreciate the author's willingness to work with stakeholders to address these concerns and look forward to working together to find solutions. If you have any questions, do not hesitate to contact Brady Guertin (Cal Cities) at bguertin@calcities.org, Tracy Rhine (RCRC) at trhine@rcrcnet.org, Chris Lee (UCC) at clee@politicogroup.com or Mark Neuburger (CSAC) at mneuburger@counties.org.

Sincerely,

Brady Guertin
Legislative Advocate

Tracy Rhine
Senior Policy Advocate, RCRC

Mark Neuburger
Legislative Advocate, CSAC

Christopher Lee
Legislative Advocate, UCC

Cc: The Honorable Matt Haney
Members, Senate Local Government Committee

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

June 3, 2026

The Honorable Jesse Arreguín
Chair, Senate Housing Committee
1021 O St. Suite 3330
Sacramento, CA 95814

RE: AB 2320 (Ta) Multifamily Housing Program: Homekey: adaptive reuse.
As amended April 27, 2026 – Support
To be heard in Senate Housing Committee.

Dear Senator Arreguín,

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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Santa Clara County

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Colusa County

Past President
Jeff Griffiths
Inyo County

CEO
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, Senate Housing Committee

May 26, 2026

The Honorable Dr. Joaquin Arambula
California State Assembly
1021 O Street, Suite 6130
Sacramento, CA 95814

RE: Assembly Bill 2605 (Arambula) – REMOVAL OF OPPOSITION
As Amended May 18, 2026

Dear Assemblymember Arambula:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Urban Counties of California (UCC), we write to remove our opposition to your measure, Assembly Bill 2605, as amended on May 18, 2026. The amendments ensure that should the bill be signed into law, the provisions only become operative upon a full and ongoing state appropriation to fund implementation. Thank you for your acknowledgement of county fiscal concerns and appreciate your continued support for the provision of indigent defense. If you 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

Climate Resolve
League of California Cities
Calleguas Municipal Water District
Sweetwater Authority
Greater Valley Conservation Corps
CALCC
Bay Planning Coalition
San Gorgonio Pass Water Agency
Established 1961
The Public Motive is the Noblest Motive
EHL
The Conservation Fund
Resource Conservation District
Greater San Diego County
thenat
San Diego Natural History Museum
Crescenta Valley Water District
Otay Water District
ACWA
Association of California Water Agencies
CLCC Foundation
Sloughhouse Resource Conservation District
Conservation Corps of Long Beach
The Nature Conservancy
East Contra Costa County Habitat Conservancy
Ag + Open Space
Sonoma County
San Diego Zoo Wildlife Alliance
WaterReuse California
Coastal Corridor Alliance
MSWD
Mission Springs Water District
CWA
California Water Association
Valley Water
Urban Corps San Diego County
Learning • Earning • Conserving
The Freshwater Trust
Sonoma Land Trust
Fire Districts Association of California
1972
San Joaquin Valley Water Collaborative Action Program
Sacramento Regional Conservation Corps
SRCC
Training Tomorrow's Workforce
Carbon Cycle Institute
AIM
Agricultural Institute of Marin
CCEJN
Central California Environmental Justice Network
Irvine Ranch Water District
Save the Redwoods League
City of Roseville California
Kern County Water Agency
BAYAREA COUNCIL
Cesar Chavez Environmental Corps
Field
WCN
Wildlife Conservation Network
Inland Empire Utilities Agency
A Municipal Water District
San Diego County Water Authority
Los Angeles Neighborhood Land Trust
Friends of Harbors, Beaches and Parks
Fresno EOC
Local Conservation Corps
Community Water Center
El Centro Comunitario por el Agua
The Metropolitan Water District of Southern California
California Council of Land Trusts
CivicCorps
Oakland, California
emwd
Eastern Municipal Water District
Mojave Water Agency
Land Trust
Santa Cruz County
CSAC
Sempervirens Fund
CASQA
California Stormwater Quality Association
California Association of Resource Conservation Districts
San Jose Conservation Corps + Charter School
Clean Water Action
Southern California Mountains Foundation
Urban Conservation Corps
Bolsa Chica Land Trust
Preserving All of Bolsa Chica
The Wildlands Conservancy
KRCD
Kings River Conservation District
CARPD
California Association of Recreation and Park Districts
Sonoma Water
Napa County Regional Park & Open Space District
Water Blueprint
for the San Joaquin Valley
Advocacy Fund
Big Sur Land Trust
For the lands you love
Upper San Luis Rey Resource Conservation District
PCWA
NCWA
Northern California Water Association
Bay Area Ridge Trail
POST
TEAM
Temecula-Elsinore Anza Murrieta
Resource Conservation District
Outward Bound
Since 1962
San Luis & Delta-Mendota Water Authority
SWID
Shafter-Wasco Irrigation District
CHCPC
California Habitat Conservation Planning Coalition
Hi-Desert Water District
Open Space Authority
Santa Clara Valley
LA Conservation Corps
Transforming Youth. Enhancing Communities.
Western Municipal Water District
Sequoia Community Corps
A California Certified Conservation Corps
CAL-IPC
California Invasive Plant Council
The Wilderness Society
California Fire Chiefs Association
Monterey One Water
RCRC
WQA
San Gabriel Basin Water Quality Authority
Save Mount Diablo
Preserve • Defend • Restore • Educate • Enjoy
Midpeninsula Regional Open Space
CASA
Rails to Trails conservancy
California State Parks Foundation
California
Groundwater Coalition
Sacramento Area Sewer District
SCWC
East Bay Regional Park District
Rancho Water
City of Sacramento
El Dorado Water Agency
CMUA
California Municipal Utilities Association
CalDesal
CalCAN
California Climate & Agriculture Network
San Juan Water
Since 1854
Urban Counties of California
Santa Margarita Water District
OCCC
Proudly Serving Our Community Since 1993
Orange County Conservation Corps

May 27, 2026

The Honorable Josh Becker
Chair, Senate Natural Resources and Water Committee
1021 O Street, Suite 3220
Sacramento, CA 95814

RE: SUPPORT – AB 35 (Alvarez): Proposition 4 Administrative Procedure Act (APA) Exemption
SET FOR JUNE 9th, 2026

Dear Chair Becker,

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 Recreation and Park Districts

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 Groundwater Coalition

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)

California Water Association

Calleguas Municipal Water District

Carbon Cycle Institute

Central California Environmental Justice Network

Cesar Chavez Environmental Corp (CCEC)

City of Roseville

City of Sacramento

Civicorps

Clean Water Action

Climate Resolve

Coastal Corridor Alliance

Collaborate Action Program

Community Water Center

Conservation Corps North Bay

Conservation Corps of Long Beach

County of San Diego

Crescenta Valley Water District

East Bay Regional Park District

East Contra Costa County Habitat Conservancy

Eastern Municipal Water District

El Dorado Water Agency

Endangered Habitats League

Fire District Association of California

Fresno EOC Local Conservation Corps

Friends of Harbors Beaches and Parks

Greater Valley Conservation Corps

Hi-Desert Water District

Inland Empire Utilities Agency

Irvine Ranch Water District

Kern County Water Agency

Kings River Conservation District

Land Trust of Santa Cruz County

League of California Cities

Los Angeles Conservation Corps

Los Angeles Neighborhood Land Trust

Metropolitan Water District of Southern California

Midpeninsula Regional Open Space District

Mission Springs Water District

Mojave Water Agency

Monterey One Water

Napa County Regional Park and Open Space District

Northern California Water Association

Orange County Conservation Corps

Otay Water District

Outward Bound Adventures (OBA)

Peninsula Open Space Trust

Placer County Water Agency

Rails to Trails Conservancy

Rancho California Water District

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 Gabriel Basin Water Quality Authority

San Gorgonio Pass Water Agency

San Joaquin Valley Water Collaborative Action Program

San Jose Conservation Corps

San Juan Water District

San Luis & Delta Mendota Water Authority

Santa Clara Valley Open Space Authority

Santa Margarita Water District

Save Mount Diablo

Save the Redwoods League

Sempervirens Fund

Sequoia Community Corps

Shafter-Wasco Irrigation District

Sloughhouse Resource Conservation District

Sonoma County Ag + Open Space

Sonoma Land Trust

Sonoma Water

Southern California Mountains Foundation

Southern California Water Coalition

Sweetwater Authority

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

Urban Counties of California

Valley Water

Water Blueprint for the San Joaquin Valley Advocacy Fund

Western Municipal Water District

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

May 29, 2026

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

RE: AB 441 (Hadwick) Wildfire prevention: Office of Wildfire Technology Research and Development: wildfire mitigation program.
As Amended on May 23, 2025 – Notice of SUPPORT
To be heard in Senate Natural Resources and Water Committee on June 9, 2026

Dear Chair Becker,

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

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

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

CSAC strongly supports expanding funding for home hardening and community resilience. Home hardening describes vegetation management compliance and building materials used to resist the intrusion of flames or embers projected by a wildland fire. CSAC supports

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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

expanding programs like the Office of Emergency Services (Cal OES) and California Department of Forestry and Fire Protection (Cal FIRE) Home Hardening Initiative and advocates for direct funding to counties beyond bond-dependent measures.

The CWMP pilot launched in 2023 to provide funding for defensible space and ignition resistant retrofits to harden approximately 2,500 homes in six counties to aid low-income residents in fire prone communities. According to the Cal OES website, there are 623 active applications, 371 assessments are currently complete, 20 homes are in progress, and 157 homes are fully complete. The CWMP is currently set to sunset on July 1, 2029.

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

For these reasons, we are pleased to **support** AB 441. 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 Heather Hadwick, Member of the California State Assembly
Members, Senate Natural Resources and Water Committee

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

May 28, 2026

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

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

Dear Chair Blakespear,

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

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

May 29, 2026

The Honorable Cottie Petrie-Norris
Chair, Assembly Utilities and Energy Committee
1020 N Street, Suite 121
Sacramento, CA 95814

RE: SB 1138 (Padilla) Load-serving entities: resource adequacy requirements
As amended April 9, 2026 – SUPPORT

Dear Chair Petrie-Norris,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we would like to express our **support** for Senate Bill 1138 (Padilla) regarding resource adequacy requirements.

In 2004, the California Public Utilities Commission (CPUC) adopted the Resource Adequacy (RA) framework to ensure there is enough electricity supply to meet customer demand. In 2025, the RA shifted to a "Slice-of-Day" (SOD) compliance structure that requires load-serving entities (LSEs) to demonstrate sufficient capacity on an hourly basis rather than through broader monthly requirements. Although the updated framework is intended to better align energy resources with real-time demand patterns, existing market rules still only allow RA products to be bought and sold monthly. As a result, LSEs are often compelled to procure excess capacity to satisfy hour-specific compliance obligations, even when additional procurement is not operationally necessary. This disconnect between hourly compliance requirements and monthly transaction structures contributes to artificial shortages in the RA market and places upward pressure on procurement costs.

SB 1138 would allow LSEs to fulfill 25% of their RA requirements by trading energy capacity with other LSEs. Permitting LSEs to buy and sell RA obligations on an hourly basis would bring market transactions into alignment with the SOD compliance framework. For these reasons, we are pleased to **support** SB 1138. Should you have any questions regarding our position, please do not hesitate to contact me at 916-809-1044 or jwells@counties.org.

CSAC Officers

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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

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

CC: The Honorable Steve Padilla, Member of the California State Senate
Members, Assembly Energy and Utilities Committee

ASSEMBLY FLOOR ALERT

Assembly Bill 1821 (Pacheo) California Public Records Act: Agency Response Time

[As Amended April 6, 2026]

SUPPORT

Our coalition requests your **AYE vote** on **AB 1821 (Pacheo).**

- AB 1821 updates California Public Records Act (CPRA) timelines by converting response periods from calendar days to business days, aligning deadlines with actual agency working days instead of weekends and holidays.
- Current law requires a determination within 10 days, with a possible 14-day extension, but does not reflect operational realities; this change allows agencies the full intended time, improving compliance.
- Local agencies have faced a 73% increase in requests over five years, with over 90% reporting diversion of staff from core services, while managing increasingly complex records requiring careful review of sensitive information.
- At the same time, agencies have lost key revenue sources that once offset these costs: Proposition 42 eliminated state reimbursement, and a 2020 California Supreme Court ruling restricted cost recovery, leaving local governments to absorb the full cost of increasingly time-intensive requests.
- AB 1821 is a modest, common-sense fix that supports transparency while improving consistency and effective implementation of the CPRA.

For these reasons, we respectfully
request your "YES" vote on **AB 1821.**

May 29, 2026

The Honorable Aisha Wahab
California State Senate
1021 O Street, Suite 8530
Sacramento, CA 95814

Re: **SB 1193 (Wahab): Discretionary funds: County of Alameda**
As amended 4/30/26 – OPPOSE
Awaiting hearing – Assembly Local Government Committee

Dear Senator Wahab:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Counties (CSAC), we write to express our opposition to your Senate Bill 1193, which place limitations on the use of certain county funds by the Alameda County Board of Supervisors. Even though SB 1193 explicitly applies to the County of Alameda, we are concerned about the precedent-setting nature of the measure.

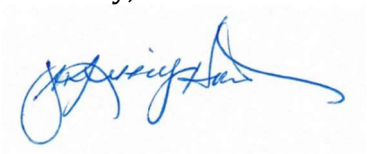
Unlike Assembly Bill 2946 (Valencia, 2024), which was approved after an Orange County supervisor – now incarcerated in a federal facility – participated in illegal activities regarding the expenditure of district-specific discretionary funds, SB 1193 imposes broad, substantial, and burdensome requirements on the Alameda County Board of Supervisors based on findings in a nearly ten-year-old grand jury report, which were expressly disputed by the County. AB 2946 was narrowly crafted to address the Orange County concern, but SB 1193 goes significantly further by expanding the definition of discretionary funds, requiring additional justifications for certain expenditures, and imposing limitations on supervisors' basic authority to appropriate funds.

To our knowledge, no currently seated Alameda County supervisor has been accused of illegal activities associated with their fiscal responsibilities to the County. No family members or close friends of the supervisors have been investigated for misuse of public funds and there is no known financial scandal with any local nonprofits. In fact, Alameda County has maintained superior bond ratings from the major rating agencies, indicating high credit quality and low risk. At the same time, the County continues to provide state-

mandated safety net services, countywide services to all county residents, and municipal services in the unincorporated area. Accordingly, we fail to understand the justification for this measure.

Regrettably, SB 1193 sets an alarming precedent that undermines the ability of the duly elected board of supervisors to appropriate county resources as it sees fit. To be clear, this fiduciary obligation lies solely with the Board of Supervisors, whose members are directly accountable to county voters. As a result, we must oppose SB 1193.

Sincerely,



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

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

cc: The Honorable Juan Carrillo, Chair, Assembly Local Government Committee
Members and Consultants, Assembly Local Government Committee
Alameda County Board of Supervisors

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

May 29, 2026

The Honorable Jesse Arreguín
Chair, Senate Housing Committee
1021 O Street, Suite 3330
Sacramento, CA 95814

RE: AB 750 (Quirk-Silva) Department of Housing and Community Development. As amended on April 29, 2026 – Notice of Support

Dear Chair Arreguín,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, we write in support of AB 750 (Quirk-Silva). This measure provides an important expansion of existing state tools to preserve affordable housing by authorizing the Department of Housing and Community Development to extend loans and grants to "challenged developments" in addition to properties already at risk of losing affordability.

By broadening eligibility, the bill recognizes the growing number of aging affordable housing developments that face financial and physical challenges but lack sufficient resources for rehabilitation.

We especially appreciate the bill's prioritization of projects with expired or soon-to-expire affordability restrictions and those at risk of conversion to market-rate housing. This targeted approach ensures that limited state resources are directed to the developments where they can have the greatest impact in preserving long-term affordability.

At a time when California continues to face severe housing shortages, preserving existing affordable units is as critical as building new ones. This bill strengthens the state's ability to protect these investments, stabilize vulnerable properties, and ensure that low-income residents are not displaced.

For these reasons, CSAC respectfully urges your "Aye" vote on AB 750. Should you have any questions regarding our position, please do not hesitate to contact me at mneuburger@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,

Mark Neuburger

Legislative Advocate
California State Association of Counties

CC: The Honorable Sharon Quirk-Silva, California State Assembly
Members and consultants, Senate Housing Committee
Kerry Yoshida, Consultant, Senate Republican Caucus

California State Association of Counties

RCRC

May 28, 2026

The Honorable Jesse Arreguín
Chair, Senate Housing Committee
1021 O Street, Suite 3330
Sacramento, CA 95814

RE: AB 2127 (Johnson) Accessory dwelling units: private sewage disposal systems. – OPPOSE
As amended April 6, 2026

Dear Chair Arreguín,

On behalf of the California State Association of Counties (CSAC) and the Rural County Representatives of California (RCRC), we respectfully write to express our **opposition** to AB 2127 (Johnson), which requires the approval of accessory dwelling units (ADUs) that are served by private septic systems.

Counties are responsible for the local public health issues as well as implementing and enforcing state and federal public health standards related to onsite wastewater treatment systems (OWTS), which apply to private septic systems. While we appreciate the author's goal of expanding housing opportunities in rural areas, we have significant concerns that AB 2127, as currently drafted, would undermine existing public health protections and place counties at risk of violating state regulatory requirements.

Conflict with State Water Resources Control Board Requirements
AB 2127 would restrict local health officers' authority to deny or condition ADU approvals where an existing septic system is determined to be functioning and has capacity, except under limited circumstances. Specifically, the bill prohibits requiring system upgrades if the system is verified by a qualified professional to have capacity, unless there is substantial evidence of a present risk. However, this framework conflicts with the State Water Resources Control Board's OWTS Policy (Water Code § 13291), which requires local agencies to implement Local Agency Management Programs (LAMPs) that include standards for siting, design, cumulative impacts, and long-term system performance. LAMPs are comprehensive regulatory programs designed to protect groundwater quality and public health across an entire watershed, particularly in areas with sensitive environmental conditions. By limiting local agency discretion and substituting a narrower, project-by-project capacity determination, AB 2127 risks forcing counties to approve ADUs that are inconsistent with

their approved LAMPs. This creates a direct compliance conflict, exposing counties to potential state and federal enforcement consequences and undermining the integrity of statewide water quality protections.

Undermining Local Public Health Authority

Existing law appropriately allows local agencies to evaluate whether septic systems are suitable for additional wastewater loads based on site-specific conditions as well as the cumulative impact this system would have on the local watershed. AB 2127, however, shifts decision-making toward a narrow determination of current system function, rather than long-term performance, environmental context, or cumulative system impacts across a watershed. This change would weaken the ability of local health officers to prevent groundwater contamination and protect drinking water supplies—particularly in rural and disadvantaged communities that rely on private wells. To be clear, no county is willing to sacrifice the large communities need for clean and safe drinking water for the sake of an individual's desire to add an outbuilding on their property.

Conclusion

While we support efforts to expand housing availability critically needed in rural areas, these efforts must not come at the expense of groundwater quality or public health. AB 2127 would create legal and regulatory conflicts with the State Water Resources Control Board's OWTS Policy and undermine the ability of local agencies to fulfill their statutory responsibilities to provide clean watersheds and ensure new development doesn't add fecal matter to the local water sources. For these reasons, we respectfully urge your Committee to vote no on AB 2127 to ensure consistency with state water quality requirements.

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties

Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California

CC: The Honorable Natasha Johnson, California State Assembly
Members and consultants, Senate Housing Committee
Kerry Yoshida, Consultant, Senate Republican Caucus

ASSEMBLY FLOOR ALERT

AB 1564 (Ahrens) Employer-Employee Relations Confidential Communications

[As Amended May 18, 2026]

OPPOSE

Our coalition representing local government, K-12 education, community colleges, higher education, and joint powers authorities risk pools, urges your **NO vote** on **Assembly Bill 1564 (Ahrens).**

- **Restricts an employer's ability to conduct internal investigations** to the detriment of the safety and well-being of employees, students, and the public by prohibiting employer questioning concerning certain employee-employee representative (e.g., union agent) communications.

- **Creates privilege-like restrictions in certain circumstances** through de facto prohibition of employers compelling disclosure of purportedly confidential communications.

- **Increases investigation and litigation costs for the state, local governments and schools** by creating incomplete investigations, since all appropriate employees with relevant information cannot be questioned. **For schools, this is a drain of Proposition 98 funding.**

- **Inconsistent with the William S. Hart Union High School District PERB decision**.

- **Employers may not know they are acting contrary to AB 1564, which could affect day-to-day critical government operations** when communicating with staff, because only the employee or the representative may know when a communication was made "in confidence."

For these reasons, our organizations respectfully **urge your "NO" vote** on **Assembly Bill 1564.**

For more information, please contact Aaron Avery, California Special Districts Association:
aarona@csda.net

ASSEMBLY FLOOR ALERT
AB 1883 (Bryan) – Workplace surveillance tools
As Amended May 18, 2026 – OPPOSE

On behalf of a broad coalition of local government, health, welfare, and school associations, we urge you to **vote NO** on Assembly Bill 1883. AB 1883 would:

- **Prohibit security systems** that meet a vague definition for making "inferences" about a worker. Modern security systems use tools that can detect symptoms of individuals in a public health setting or recognize individuals banned from areas for security purposes.
- **Subject public agencies to severe fines and legal liability**, including damages, attorney fees, and a direct $500 fine. At a time when schools and public agencies are facing severe fiscal distress, AB 1883 would make it easy to sue over new vague legal standards.
- **Provide no resources or time to comply**, as the bill would take effect just a few months after enactment, with no appropriation or State support for local agencies.

Vote NO on AB 1883

For more information, please contact Eric Lawyer, California State Association of Counties: (elawyer@counties.org).

ASSEMBLY FLOOR ALERT

AB 2656 (Petrie-Norris): Public Employees: notice: artificial intelligence performing service within the scope of work

As Amended April 14, 2026

OPPOSE

The above organizations, representing local public agencies, urge your NO vote on 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.

The notification requirements contained in AB 2656 will burden local agency employers, preclude efficiencies, impact service delivery, and undermine productive labor relations with little benefit.

Notification requirements, particularly for tools that have become routine elements of daily office life, can be counter-productive, inefficient, and overly burdensome, requiring time, legal resources, and training to achieve.

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.

Existing law already 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.

AB 2656 is overly broad and unnecessary. We respectfully urge your NO vote.

California State Association of Counties®
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May 19, 2026

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

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

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

RE: 2026-27 May Revision Proposal and County Partnership

Dear Speaker Rivas, Assembly Member Gabriel, and Assembly Member Flora,

The California State Association of Counties (CSAC), proudly representing all 58 of the state's counties, stands ready to work with the Legislature to enact a budget for 2026-27 that supports counties in delivering the services that Californians desperately rely on. There is no bigger priority for CSAC than to unwaveringly address the fiscal challenges the state and counties face and meet our collective responsibility for the safety and wellbeing of all Californians.

We recognize that this year's state budget deliberations are shaped by ongoing state and federal tensions and recent federal policies that impact California's fiscal condition. While building reserves and addressing budget deficits are necessary, the budget must also take meaningful action to mitigate impacts on California's communities, particularly those associated with H.R. 1. Without additional support from the state, counties cannot deliver the essential services Californians need and deserve.

CSAC remains deeply concerned about the Administration's choice to provide virtually no additional funding to implement H.R. 1, address homelessness, and reduce crime, as well as maintain the In-Home Supportive Services (IHSS) cost shift proposal included in the Governor's January Budget. These are not optional programs; they are core to the state's long-term health, safety, and stability. This is why, yet again, counties are looking to the

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Legislature to lead on these issues and prioritize resources for the safety and wellbeing of our shared constituency.

CSAC appreciates the continued partnership with the Legislature and respectfully offers the following comments about the Governor's May Revision budget proposal.

County HHS H.R. 1 Impacts

The Governor's May Revision provides only a modest investment toward the impacts of H.R. 1, with no additional funding for indigent health care, public hospital systems, or behavioral health systems. Counties are facing cost increases of up to $9.5 billion per year due to H.R. 1 and have submitted a reasonable budget request of $1.9 billion in 2026-27 and $4.5 billion in 2027-28.

Specifically, the May Revision provides barely any of the General Fund resources counties requested for H.R. 1 – just $87.2 million General Fund in 2026-27 for county eligibility work only, which will help people retain health care and food benefits, but even that amount represents a fraction of the need. This proposal leaves counties on their own to serve Californians who will be losing medical care and nutrition assistance and whose health and wellbeing will suffer without state support.

Furthermore, the Administration suggests revenues from the proposed sales tax on digital prewritten software would offset costs of H.R. 1. Notwithstanding the merits of the sales tax proposal, a majority of increased sales tax revenues for counties is not discretionary and must be spent on specified services, leaving little additional funding for what is needed to implement H.R. 1. Moreover, even if these funds could be used for H.R. 1, total county revenues would still fall well short of the estimated cost increases identified above.

In-Home Supportive Services (IHSS)

CSAC is disappointed that the May Revision maintains the January Budget IHSS cost shift proposal and is grateful that the Assembly has already stated an intention to reject it.

Starting in 2027-28, this proposal would shift $233.6 million in IHSS costs to counties and grow each year. 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.

The IHSS cost shift proposal runs contrary to the purpose of the 2019 county IHSS Maintenance of Effort and would cause counties to have to redirect funding from other critical health and mental health programs. Even more concerning, it compounds the county H.R. 1 fiscal pressures with the state proposing to shift additional safety net costs that would require cuts to core county services that our communities rely on. CSAC urges the Assembly to remain steadfast in rejecting this proposal during upcoming budget negotiations.

Homeless Housing, Assistance, and Prevention (HHAP) Program

The May Revision falls short on what is needed for homelessness by continuing to propose only $500 million for Round 7 of the HHAP program. This funding is a 50 percent reduction from the $1 billion provided in prior rounds and there is no ongoing investment.

Through our collective efforts, California is making strides in reducing homelessness and now is not the time to walk back this commitment, especially with our safety net threatened by H.R. 1. Counties continue to advocate for $1 billion for Round 7 and for this funding to be ongoing, which is the only way to achieve sustained progress.

CSAC looks forward to continued engagement on the proposed trailer bill language for Round 7 implementation. While appreciative of application streamlining and some flexibilities provided for new accountability measures, we have strong concerns about the new required local match and that requirements would be implemented in a manner that will not allow this funding to be distributed by the September 1, 2026 goal date.

Proposition 36

Counties continue to face significant challenges with Proposition 36 implementation, which was approved in all 58 counties by an overwhelming statewide majority. We appreciate the Assembly's continued commitment to secure funding. However, the one-time funding approved in last year's budget falls short of the local treatment, supervision, and rehabilitative needs in communities across California.

Counties are in dire need of funding to deliver recovery support services and build out substance use and mental health treatment capacity, a crucial component of the measure. Thus, CSAC is in strong support of the $400 million budget request which members in your house have championed to expand service capacity, secure appropriate in custody treatment, and allow for individualized planning, monitoring, and supervision for individuals

in the community. Further, we would respectfully urge that should funding be included in the final budget agreement, allocations are immediately distributed to counties. Ultimately, counties are grateful for the Legislature recognizing the barriers to implementation and the need for local funding, but we are in dire need of sustainable and much larger investments across county departments to see the results that California voters expect. Counties cannot continue to shoulder the mounting fiscal burden alone, especially in light of the looming impacts of H.R. 1.

Development Impact Fees

CSAC has significant concerns with the Administration's proposal to discourage or prohibit local development impact fees assessed on affordable housing projects. Development impact fees are strictly cost recovery tools, not revenue sources, used by counties to fund development related essential infrastructure and services, such as water, sewer, fire protection, parks, flood control, and libraries, necessary for new housing and economic development. These fees are the primary and often sole funding source for some counties that lack broad revenue streams and therefore cannot build or improve facilities without this fee revenue. By discouraging or prohibiting the use of these fees, this proposal assumes that residents of affordable housing do not deserve the critical infrastructure, such as safe drinking water systems, adequate sewer facilities, and available park spaces, that development impact fees support.

The May Revision proposal includes an incentive route that would allow project applicants to count any development fees deferred, reduced or waived by a county as a local funding match. This part of the proposal does not guarantee the project will receive state funding. Therefore, CSAC believes this proposal will not lead to additional jurisdictions deferring or waiving these fees, especially considering the fiscal impact that H.R. 1 will have on counties.

Finally, CSAC has concerns with requiring counties to waive development fees when they are the applicant or co-applicant on a state housing grant. While the primary target of this proposal appears to be grants made by the Homekey program, the trailer bill language is overly broad and applies to a wider array of affordable housing programs. CSAC believes this component of the proposal will result in counties refusing to become lead or co-applicants on these types of housing development projects. This will have the opposite effect that the state is seeking – to incentivize the construction of affordable housing; specifically, the strong potential that a smaller number of affordable housing units will be constructed.

Thank you for considering CSAC positions on the above May Revision issues. Counties deliver critical, life-saving services to California communities on behalf of the state and as such, CSAC believes that the health, safety, and wellbeing of Californians are directly tied to the fiscal health of counties. Without adequate support, the state is leaving counties and communities to stabilize these systems at the severe expense of other public services such as public safety, fire response, elections, and more. We urge the Legislature to meet this moment and stand with counties to protect the essential services millions of Californians rely on every single day. We remain committed to working with the Legislature toward equitable, sustainable solutions that protect all Californians.

Respectfully,

Graham Knaus
Chief Executive Officer, CSAC

CC : Honorable Members, Assembly Budget Committee
Jason Sisney, Budget Director, Office of Assembly Speaker Robert Rivas
Christian Griffith, Chief Consultant, Assembly Budget Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus
Gabriel Petek, Legislative Analyst, Legislative Analyst's Office
Carolyn Chu, Chief Deputy Legislative Analyst, Legislative Analyst's Office

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May 18, 2026

The Honorable Monique Limón
Senate President Pro Tempore
1021 O Street, Suite 8518
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 Roger Niello
Vice Chair, Senate Committee on Budget and Fiscal Review
1021 O Street, Suite 7110
Sacramento CA, 95814

RE: 2026-27 May Revision Proposal and County Partnership

Dear President Pro Tempore Limón, Senator Laird, and Senator Niello,

The California State Association of Counties (CSAC), proudly representing all 58 of the state's counties, stands ready to work with the Legislature to enact a budget for 2026-27 that supports counties in delivering the services that Californians desperately rely on. There is no bigger priority for CSAC than to unwaveringly address the fiscal challenges the state and counties face and meet our collective responsibility for the safety and wellbeing of all Californians.

We recognize that this year's state budget deliberations are shaped by ongoing state and federal tensions and recent federal policies that impact California's fiscal condition. While building reserves and addressing budget deficits are necessary, the budget must also take meaningful action to mitigate impacts on California's communities, particularly those associated with H.R. 1. Without additional support from the state, counties cannot deliver the essential services Californians need and deserve.

CSAC remains deeply concerned about the Administration's choice to provide virtually no additional funding to implement H.R. 1, address homelessness, and reduce crime, as well as maintain the In-Home Supportive Services (IHSS) cost shift proposal included in the Governor's January Budget. These are not optional programs; they are core to the state's

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long-term health, safety, and stability. This is why, yet again, counties are looking to the Legislature to lead on these issues and prioritize resources for the safety and wellbeing of our shared constituency.

CSAC appreciates the continued partnership with the Legislature and respectfully offers the following comments about the Governor's May Revision budget proposal.

County HHS H.R. 1 Impacts

The Governor's May Revision provides only a modest investment toward the impacts of H.R. 1, with no additional funding for indigent health care, public hospital systems, or behavioral health systems. Counties are facing cost increases of up to $9.5 billion per year due to H.R. 1 and have submitted a reasonable budget request of $1.9 billion in 2026-27 and $4.5 billion in 2027-28.

Specifically, the May Revision provides barely any of the General Fund resources counties requested for H.R. 1 – just $87.2 million General Fund in 2026-27 for county eligibility work only, which will help people retain health care and food benefits, but even that amount represents a fraction of the need. This proposal leaves counties on their own to serve Californians who will be losing medical care and nutrition assistance and whose health and wellbeing will suffer without state support.

Furthermore, the Administration suggests revenues from the proposed sales tax on digital prewritten software would offset costs of H.R. 1. Notwithstanding the merits of the sales tax proposal, a majority of increased sales tax revenues for counties is not discretionary and must be spent on specified services, leaving little additional funding for what is needed to implement H.R. 1. Moreover, even if these funds could be used for H.R. 1, total county revenues would still fall well short of the estimated cost increases identified above.

In-Home Supportive Services (IHSS)

CSAC is disappointed that the May Revision maintains the IHSS cost shift proposal from the January Budget, and is grateful that the Senate has already stated an intention to reject it.

Starting in 2027-28, this proposal would shift $233.6 million in IHSS costs to counties and grow each year. 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.

The IHSS cost shift proposal runs contrary to the purpose of the 2019 county IHSS Maintenance of Effort and would cause counties to have to redirect funding from other critical health and mental health programs. Even more concerning, it compounds the county H.R. 1 fiscal pressures with the state proposing to shift additional safety net costs that would require cuts to core county services that our communities rely on. CSAC urges the Senate to remain steadfast in rejecting this proposal during upcoming budget negotiations.

Homeless Housing, Assistance, and Prevention (HHAP) Program

The May Revision falls short on what is needed for homelessness by continuing to propose only $500 million for Round 7 of the HHAP program. This funding is a 50 percent reduction from the $1 billion provided in prior rounds and there is no ongoing investment.

Through our collective efforts, California is making strides in reducing homelessness and now is not the time to walk back this commitment, especially with our safety net threatened by H.R. 1. Counties continue to advocate for $1 billion for Round 7 and for this funding to be ongoing, which is the only way to achieve sustained progress.

CSAC looks forward to continued engagement on the proposed trailer bill language for Round 7 implementation. While appreciative of application streamlining and some flexibilities provided for new accountability measures, we have strong concerns about the new required local match and that requirements would be implemented in a manner that will not allow this funding to be distributed by the September 1, 2026 goal date.

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Counties continue to face significant challenges with Proposition 36 implementation, which was approved in all 58 counties by an overwhelming statewide majority. We appreciate the Senate's continued commitment to secure funding. However, the one-time funding approved in last year's budget falls short of the local treatment, supervision, and rehabilitative needs in communities across California.

Counties are in dire need of funding to deliver recovery support services and build out substance use and mental health treatment capacity, a crucial component of the measure.

Thus, CSAC is in strong support of the $400 million budget request which members in your house have championed to expand service capacity, secure appropriate in custody treatment, and allow for individualized planning, monitoring, and supervision for individuals in the community. Further, we would respectfully urge that should funding be included in the final budget agreement, allocations are immediately distributed to counties.

Ultimately, counties are grateful for the Legislature recognizing the barriers to implementation and the need for local funding, but we are in dire need of sustainable and much larger investments across county departments to see the results that California voters expect. Counties cannot continue to shoulder the mounting fiscal burden alone, especially in light of the looming impacts of H.R. 1.

Development Impact Fees

CSAC has significant concerns with the Administration's proposal to discourage or prohibit local development impact fees assessed on affordable housing projects. Development impact fees are strictly cost recovery tools, not revenue sources, used by counties to fund development related essential infrastructure and services, such as water, sewer, fire protection, parks, flood control, and libraries, necessary for new housing and economic development. These fees are the primary and often sole funding source for some counties that lack broad revenue streams and therefore cannot build or improve facilities without this fee revenue. By discouraging or prohibiting the use of these fees, this proposal assumes that residents of affordable housing do not deserve the critical infrastructure, such as safe drinking water systems, adequate sewer facilities, and available park spaces, that development impact fees support.

The May Revision proposal includes an incentive route that would allow project applicants to count any development fees deferred, reduced or waived by a county as a local funding match. This part of the proposal does not guarantee the project will receive state funding. Therefore, CSAC believes this proposal will not lead to additional jurisdictions deferring or waiving these fees, especially considering the fiscal impact that H.R. 1 will have on counties.

Finally, CSAC has concerns with requiring counties to waive development impact fees when they are the applicant or co-applicant on a state housing grant creates significant concerns. While the primary target of this proposal appears to be grants made by the Homekey program, the trailer bill language is overly broad and applies to a wider array of affordable

housing programs. CSAC believes this component of the proposal will result in counties refusing to become lead or co-applicants on these types of housing development projects. This will have the opposite effect that the state is seeking – to incentivize the construction of affordable housing; specifically, the strong potential that a smaller number of affordable housing units will be constructed.

Thank you for considering CSAC positions on the above May Revision issues. Counties deliver critical, life-saving services to California communities on behalf of the state and as such, CSAC believes that the health, safety, and wellbeing of Californians are directly tied to the fiscal health of counties. Without adequate support, the state is leaving counties and communities to stabilize these systems at the severe expense of other public services such as public safety, fire response, elections, and more. We urge the Legislature to meet this moment and stand with counties to protect the essential services millions of Californians rely on every single day. We remain committed to working with the Legislature toward equitable, sustainable solutions that protect all Californians.

Respectfully,

Graham Knaus
Chief Executive Officer, CSAC

CC : Honorable Members, Senate Committee on Budget and Fiscal Review
Mariana Corona Sabeniano, Chief of Staff, 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

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

May 18, 2026

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

RE: 2026-27 May Revision Proposal and County Partnership

Dear Governor Newsom,

The California State Association of Counties (CSAC), proudly representing all 58 of the state's counties, remains ready to work with your Administration to enact a budget for 2026-27 and beyond that supports counties in delivering the services that Californians desperately rely on. There is no bigger priority for CSAC than to unwaveringly address the fiscal challenges the state and counties face and meet our collective responsibility for the safety and wellbeing of all Californians.

We recognize that this year's state budget deliberations are shaped by ongoing state and federal tensions and recent federal policies that impact California's fiscal condition. While building reserves and addressing budget deficits are necessary, it remains paramount that this budget takes meaningful action to mitigate impacts on California's communities, particularly as it relates to H.R. 1. Without additional support from the state, counties cannot deliver the essential services Californians need and deserve.

CSAC remains deeply concerned about the choice to provide virtually no additional funding to implement H.R. 1, address homelessness, and reduce crime, as well as to maintain the In-Home Supportive Services (IHSS) cost shift proposal included in the January Budget. These are not optional programs; they are core to the state's long-term health, safety, and stability. Regardless of what we may not see eye-to-eye on, the state and local governments cannot afford to forgo collaboration to reach a consensus on shared responsibility and reliable funding.

To this end, CSAC submits the following comments regarding the 2026-27 May Revision to inform budget conversations during the coming weeks.

County HHS H.R. 1 Impacts

The May Revision provides only a modest investment towards the impacts of H.R. 1, with no additional funding for indigent health care, public hospital systems, or behavioral

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health systems. Counties are facing cost increases of up to $9.5 billion per year due to H.R. 1 and have submitted a reasonable budget request of $1.9 billion in 2026-27 and $4.5 billion in 2027-28.

Specifically, the May Revision provides barely any of the General Fund resources counties requested for H.R. 1 – just $87.2 million General Fund in 2026-27 for county eligibility work only, which will help people retain health care and food benefits, but even that amount represents a fraction of the need. This proposal leaves counties on their own to serve Californians who will be losing medical care and nutrition assistance and whose health and well-being will suffer without state support.

Furthermore, the Administration suggests revenues from the proposed sales tax on digital software would offset costs of H.R. 1. Notwithstanding the merits of the sales tax proposal, a majority of increased sales tax revenues for counties are not discretionary and must be spent on specified services, leaving little additional funding for what is needed to implement H.R. 1. Moreover, even if these funds could be used for H.R. 1, total county revenues would still fall well short of the estimated cost increases identified above.

In-Home Supportive Services (IHSS)
CSAC is disappointed that the May Revision maintains the IHSS cost shift proposal from the January Budget, especially after both houses of the Legislature indicated they plan to reject it.

Starting in 2027-28, this proposal would shift $233.6 million in IHSS costs to counties and grow each year. 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.

The IHSS cost shift proposal runs contrary to the purpose of the 2019 county IHSS Maintenance of Effort and would cause counties to have to redirect funding from other critical health and mental health programs. Even more concerning, it compounds the county H.R. 1 fiscal pressures with the state proposing to shift additional safety net costs that would require cuts to core county services that our communities rely on.

Homeless Housing, Assistance, and Prevention (HHAP) Program
The May Revision falls short on what is needed for homelessness by continuing to propose only $500 million for a Round 7 of the HHAP program. This funding is a 50 percent reduction from the $1 billion provided in prior rounds and there is no ongoing investment.

Through our collective efforts, California is making strides in reducing homelessness and now is not the time to walk back this commitment, especially with our safety net threatened by H.R. 1. Counties continue to advocate for $1 billion for Round 7 and for this funding to be ongoing, which is the only way to achieve sustained progress.

CSAC looks forward to continued engagement on the proposed trailer bill language for Round 7 implementation. While appreciative of application streamlining and some flexibilities provided for new accountability measures, we have strong concerns about the new required local match and that requirements would be implemented in a manner that will not allow this funding to be distributed by the September 1, 2026 goal date.

Proposition 36

Counties continue to face significant challenges fully implementing Proposition 36, which was approved in all 58 counties and by an overwhelming majority statewide. It is once again disappointing that the May Revision fails to acknowledge the importance of funding local implementation. While we appreciate the investment included in last year's budget, it was one-time and only for one department, which falls far short of the local treatment, supervision, and rehabilitative needs across county departments.

Counties are in dire need of funding to deliver recovery support services and build out substance use and mental health treatment capacity, a crucial component of the measure. That is why we are in support of the $400 million budget request for recovery support services and substance use treatment to meet the expectations of voters who sought change through the ballot initiative. Further, we would respectfully urge that should funding be included in the final budget agreement, allocations are made expeditiously to meet the real time demand for services by our county impacted departments such as behavioral health and probation. Ultimately, counties and the individuals we serve should not be forced to endure months of waiting for funding to be allocated from the state to provide and receive the treatment that is so desperately needed.

Development Impact Fees

CSAC has significant concerns with the Administration's proposal to discourage or prohibit local development impact fees assessed on affordable housing projects. Development impact fees are strictly cost recovery tools, not revenue sources, used by counties to fund development related essential infrastructure and services, such as water, sewer, fire protection, parks, flood control, and libraries, necessary for new housing and economic development. These fees are the primary and often sole funding source for some counties that lack broad revenue streams and therefore cannot build or improve facilities without this fee revenue. By discouraging or prohibiting the use of these

fees, this proposal assumes that residents of affordable housing do not deserve the critical infrastructure, such as safe drinking water systems, adequate sewer facilities, and available park spaces, that development impact fees support.

The May Revision proposal includes an incentive route that would allow project applicants to count any development fees deferred, reduced or waived by a county as a local funding match. This part of the proposal does not guarantee the project will receive state funding. Therefore, CSAC believes this proposal will not lead to additional jurisdictions deferring or waiving these fees, especially considering the fiscal impact that H.R. 1 will have on counties.

Finally, CSAC has concerns with requiring counties to waive development fees when they are the applicant or co-applicant on a state housing grant. While the primary target of this proposal appears to be grants made by the Homekey program, the trailer bill language is overly broad and applies to a wider array of affordable housing programs. CSAC believes this component of the proposal will result in counties refusing to become lead or co-applicants on these types of housing development projects. This will have the opposite effect that the state is seeking – to incentivize the construction of affordable housing; specifically, the strong potential that a smaller number of affordable housing units will be constructed.

Thank you for considering CSAC positions on the above May Revision issues. Counties deliver critical, life-saving services to California communities on behalf of the state and as such, CSAC believes that the health, safety, and wellbeing of Californians are directly tied to the fiscal health of counties. Without adequate support, the state is leaving counties and communities to stabilize these systems at the severe expense of other public services such as public safety, fire response, elections, and more. We need the state to meet the urgency this moment demands and stand with counties to protect the essential services millions of Californians rely on every single day. We remain committed to working with the Administration toward equitable, sustainable solutions that protect all Californians

Respectfully,

Graham Knaus
Chief Executive Officer, CSAC

CC : Nathan Barankin, Chief of Staff, Office of the Governor
Jamie Callahan, Deputy Chief of Staff, Office of the Governor
Christine Aurre, Legislative Affairs Secretary, Office of the Governor
Nani Coloretti, Cabinet Secretary, Office of the Governor
Joe Stephenshaw, Director, California Department of Finance
Erika Li, Chief Deputy Director of Budgets, California Department of Finance

California Alliance
Empowering lives. Enriching futures.
Californians for Safety and Justice
MHA Mental Health America of California
cbhda
COUNTY BEHAVIORAL HEALTH DIRECTORS ASSOCIATION
CALIFORNIA
CAMFT
California Youth Empowerment Network
CAYEN
Sycamores
a better life
Disability Rights California
CSAP
CALIFORNIA STATE ASSOCIATION OF PSYCHIATRISTS
NAMI California
National Alliance on Mental Illness
STEINBERG INSTITUTE
Children Now
CALIFORNIA ACADEMY of CHILD & ADOLESCENT PSYCHIATRY
CAL VOICES
ADVOCACY • RECOVERY • PEER SUPPORT
DRUG POLICY ALLIANCE
CCBH
California Coalition for Behavioral Health
LIVE
CBHA
CALIFORNIA BEHAVIORAL HEALTH ASSOCIATION
Camhpro
CALIFORNIA OPIOID MAINTENANCE PROVIDERS
NATIONAL HEALTH LAW PROGRAM
Pacific Clinics
TARZANA TREATMENT CENTERS
Integrated Healthcare
seneca
unconditional care
CALIFORNIA PSYCHOLOGICAL ASSOCIATION
CALIFORNIA STATE ASSOCIATION OF PA|PG|PC
CAADPE
CALIFORNIA ASSOCIATION OF ALCOHOL AND DRUG PROGRAM EXECUTIVES
RCS
Redwood Community Services, Inc.
CALIFORNIA PUBLIC DEFENDERS ASSOCIATION
National Center for Youth Law
California Hospital Association
California Behavioral Health Planning Council
ADVOCACY • EVALUATION • INCLUSION
CALIFORNIA LGBTQ HEALTH AND HUMAN SERVICES NETWORK
California Association of Local Behavioral Health Boards and Commissions
EMERGENCY MEDICAL SERVICES ADMINISTRATORS' ASSOCIATION OF CALIFORNIA
EMSAAC
ACLU CALIFORNIA ACTION
JUDGE DAVID L. BAZELON CENTER FOR MENTAL HEALTH LAW
911 AMBULANCE PROVIDER'S ALLIANCE
AMR
Global Medical Response
CSH
edgewood
Hillsides
CREATING LASTING CHANGE
ACHSA
SHERIFF SACRAMENTO COUNTY
CRISIS SUPPORT SERVICES of Alameda County
DIDI HIRSCH
988 CRISIS CENTER CONSORTIUM CALIFORNIA
CASA PACIFICA®
CENTERS FOR CHILDREN & FAMILIES
LEAGUE OF CALIFORNIA CITIES
CITY OF EUREKA CALIFORNIA
MH
THE MILES HALL FOUNDATION
calpcc
California Association for Licensed Professional Clinical Counselors

May 21, 2026

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

Honorable John Laird (Chair)
Senate Budget and Fiscal Review Committee
1020 N. Street, Room 502
Sacramento, CA 95814

Honorable Dawn Addis (Chair)
Assembly Budget Subcommittee #1 – Health
1021 O. Street, Suite 4120
Sacramento, CA 95814

Honorable Caroline Menjivar (Chair)
Senate Budget Subcommittee #3 – Health and Human Services
1021 O Street, Suite 6630
Sacramento, CA 95814

Subject: Continued Opposition to Governor's 2026-27 Budget Proposal to Eliminate the Statewide Medi-Cal Mobile Crisis Benefit

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Dear Senators Laird and Menjivar, and Assemblymembers Gabriel and Addis,

The undersigned organizations share a common mission of improving the behavioral health of Californians. As such, we write to express our strong opposition to the proposed elimination of the statewide Medi-Cal Community-Based Mobile Crisis Intervention Services benefit (referred to as the Mobile Crisis Benefit).The proposal to shift this benefit from a mandatory statewide Medi-Cal benefit to an optional, county-funded benefit poses significant risks to ensuring that all Californians have access to a comprehensive behavioral health crisis response system.

Since its implementation, the Medi-Cal Mobile Crisis benefit has provided timely, coordinated, and clinically appropriate behavioral health crisis support throughout the state. Although the benefit was established to serve the Medi-Cal population, mobile crisis teams are designed to respond regardless of insurance status. In practice, these teams serve not only individuals enrolled in the Medi-Cal program, but also individuals served through commercial insurance or those who lack insurance. Mobile crisis teams have successfully diverted individuals experiencing behavioral health crises from emergency departments and reduced unnecessary law enforcement involvement. Mobile crisis teams have also contributed to significant reductions in Lanterman-Petris-Short (LPS) 5150 involuntary psychiatric holds, which can be traumatic and have lasting negative impacts on individuals and their families, and have helped connect individuals to ongoing behavioral health services. In addition, mobile crisis teams are essential to local efforts to address homelessness, substance use conditions, as well as the youth mental health crisis. Notably, 44% of adults who utilized a mobile crisis team were connected to mental health services within 30 days of these services.[1]

[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

This proposal was first introduced in the Governor's January budget and remains unchanged in the May Revision despite the harmful consequences that eliminating this benefit would have on California's most vulnerable individuals. While the May Revision includes a $20.1 million General Fund offset from the Behavioral Health Services Fund in 2026-27 to support Qualifying Community-Based Mobile Crisis Services, this funding is intended only to cover the state's share of the current benefit through March 31, 2027, in lieu of the 988 funding proposed in the Governor's Budget. Under the Governor's Budget proposal, DHCS proposes to recast mobile crisis response services as an optional Medi-Cal benefit available only in counties that elect to participate, effective April 1, 2027,

Making this an optional benefit could result in increased county costs of approximately $169 million annually to cover the non-federal share of costs, based on current utilization of the benefit. This proposal also comes at a time when counties are implementing the Behavioral Health Services Act (BHSA), updated by Proposition 1 and which becomes effective July 1, 2026. The BHSA in part restructures permissible uses of county funding by shifting resources from mental health services to housing. Combined with the impacts of House Resolution 1 (H.R. 1), these changes will place ever greater strain on county resources. Counties are already forced to make difficult decisions within existing fiscal constraints, and their ability to utilize existing local funding sources is limited. Therefore, **counties may be forced to reduce the scope of mobile crisis services or eliminate this benefit entirely**, leaving too many vulnerable individuals without access to essential community-based crisis response.

Over the last several years, both the State and counties have made substantial investments to build out the infrastructure, workforce capacity, and systems coordination necessary to deliver this benefit effectively. Scaling back coverage of this benefit now would undermine those investments, creating to gaps in access to crisis services, and thus lead to negative outcomes for children and adults with behavioral health crisis needs.

Furthermore, under the federal Medicaid Early and Periodic Screening Diagnostic and Treatment (EPSDT) mandate, counties will still be required to provide mobile crisis response to Medicaid-enrolled children and youth under the age of 21. A system in which children's mobile crisis services are mandatory while adult mobile crisis services are optional, creates more confusion and harm for vulnerable individuals, providers, and counties.

For these reasons, we thank the Assemblymembers and Senators who have already voiced their opposition to this budget proposal. We respectfully urge the Legislature to include in its budget plan a rejection of the proposal to eliminate the Medi-Cal Mobile Crisis benefit. Maintaining mobile crisis services as a mandatory statewide Medi-Cal benefit, will ensure equitable access to behavioral health crisis services throughout the state and preserve the significant number of investments already made in the state's behavioral health crisis continuum.

Sincerely,

Adrienne Shilton
Senior Vice President of Public Policy & Strategy
California Alliance of Child and Family Services

Michelle Cabrera
Executive Director
County Behavioral Health Directors Association

And the undersigned organizations:

John Surface
President
911 Ambulance Provider Alliance

Alicia Benavidez
Director of Legislative Affairs
ACLU California Action

Thomas Wagner
President, National Operations
American Medical Response

Lizzie Guansona
Legislative Advocate
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Suzzette Garcia
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California Association of Licensed Professional Clinical Counselors

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Taun Hall
Executive Director
The Miles Hall Foundation

CC:

Honorable Roger Niello, Vice Chair Senate Budget Committee
Scott Ogus, Senate Budget Subcommittee #3
Patrick Le, Assembly Budget Subcommittee #1
Anthony Archie, Senate Budget Republican Caucus
Eric Dietz, Assembly Republican Caucus
Richard Figueroa, Deputy Cabinet Secretary, Governor's Office
Joe Stephenshaw, Director, Department of Finance
Erika Li, Chief Deputy Director, Budgets, Department of Finance
Guadalupe Manriquez, Program Budget Manager, Health, Department of Finance
Kim Johnson, Secretary, California Health and Human Services Agency
Corrin Buchanan, Undersecretary, California Health and Human Services Agency
Stephanie Welch, Deputy Secretary of Behavioral Health, California Health and Human Services Agency
Brent Houser, Assistant Secretary, California Health and Human Services Agency
Michelle Baass, Director, Department of Health Care Services
Tyler Sadwith, Medicaid Director, Department of Health Care Services
Paula Wilhelm, Deputy Director, Behavioral Health, Department of Health Care Services

May 21, 2026

To: The Honorable Caroline Menjivar
Chair, Senate Budget Subcommittee No. 3

Honorable Members
Senate Budget Subcommittee No. 3

The Honorable Corey Jackson
Chair, Assembly Budget Subcommittee No. 2

Honorable Members
Assembly Budget Subcommittee No. 2

RE: ELIMINATION OF CRITICAL SAFEGUARDS FOR OLDER AND DEPENDENT ADULTS: ADULT PROTECTIVE SERVICES (APS) – OPPOSE

The undersigned organizations ***strongly oppose*** the budget cut to Adult Protective Services (APS) in the Governor's 2026-27 May Revision proposal. The Governor's May Revision proposes a permanent $70 million General Fund (GF) reduction to APS response to victims of abuse, neglect and exploitation, raising the age of eligibility for APS services from 60 to 65, and reversing the APS expansion approved in the 2021 Budget Act with the sponsorship and support of the undersigned coalition.

Cuts of this magnitude in a single program focused on the most vulnerable amongst our older adult population would reverse much-needed investments in older adults and persons with disabilities with the highest needs. This proposal will reverse hard-earned progress in advancing elder justice and undermines efforts to advance California's Master Plan for Aging. This disinvestment threatens to unravel critical safety net services that keep older adult victims of abuse, neglect, and financial exploitation safe, often serving as the last stop preventing homelessness, institutionalization in nursing homes, hospitalization, and death.

APS currently serves individuals over 60 and dependent adults ages 18-59 who are victims of abuse, neglect, and exploitation. Law enforcement, doctors, other mandated reporters and the community rely on APS services to protect these individuals from further abuse. APS is an effective program that responded to 309,354 reports of abuse statewide in FY 2024-25. The proposed cut in APS funding will result in the loss of critical and lifesaving responses and services and place older adults at risk of harm, institutionalization, and premature death. This reduction in safety net services would also be occurring at the same time that overall services for vulnerable Californians are at risk because of the implementation of H.R. 1.

APS Expansion Funds. Approved in the 2021 Budget Act, funding ($70 million General Fund) for the APS expansion allowed APS eligibility for adults between the ages of 60-64 and allowed for longer-term case management for adults with more complex needs. Since the implementation of the APS expansion, APS clients aged 60-64 have more than doubled from about 920 cases per month to an average of roughly 1,900 cases per month in FY 2024-25[1], which signifies that APS services are both needed and warranted to address abuse, neglect, and exploitation.

Counties were severely underfunded prior to the AB 135 expansion, and continue to be to this day. Eliminating the $70 million would further undermine counties' ability to protect and support vulnerable adults, significantly destabilizing the program and counties' capacity to serve the entire population. For instance, in one large county, the allocation makes up more than a third of their entire APS budget after accounting for federal funds drawdown. As such, beyond eliminating services entirely to those age 60-64, based on the magnitude of impact on county budgets overall, service-delivery will also be put at risk for those 65 and older whose eligibility would not change under this proposal, but for whom impacts may be felt.

Significant Impacts on Older Adult Homelessness, including the Home Safe Program. The proposed elimination of the APS expansion comes at a moment when California is facing a rapidly deepening crisis among older adults experiencing homelessness. Older adults are the fastest-growing segment of the unhoused population in California, with the number of adults age 65 and older accessing homelessness services increasing by 166 percent between 2017 and 2022[2]. With California's older adult population continuing to grow, this trend is expected to

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[1] Data taken from APS Data Dashboard available at https://tableau.dss.ca.gov/t/RADD/views/STATEWIDEAPSSOC242/ToC?%3Aembed=y&%3Aiid=1&%3AisGuestRedirectFromVizportal=y

[2] California Commission on Aging. *Housing Those Hardest Hit: Addressing Older Adult Homelessness—Targeted Strategies.* 2024. https://ccoa.ca.gov/docs/Publications/2024/CCoA%20Housing%20Policy%20Brief%20Final.pdf

accelerate. Older adults experiencing homelessness face heightened vulnerability to abuse, neglect, and financial exploitation, often compounded by chronic health conditions, cognitive decline, and social isolation. APS plays a critical role in identifying and responding to these risks.

The APS program is a gateway to the Home Safe Program, a successful program serving older adults who are experiencing homelessness or at-risk of homelessness who come to the attention of APS due to abuse, neglect, or exploitation. Home Safe offers tangible housing assistance for its clients, acting as a critical buffer to preventing homelessness and helping older adults maintain stable and safe housing. According to a University of California San Francisco (UCSF) study of the Home Safe program, 93.9% of Home Safe clients who were housed at program entry remained housed at exit, and 58.4% of those homeless at program entry were housed at exit[3]. By lowering the eligibility threshold from age 65 to 60, the expansion has enabled earlier intervention, often preventing further deterioration and prolonged homelessness. It also allows APS to engage individuals who may be newly homeless and at high risk but not yet connected to other systems of care. Adults aged 60 to 64, who are already experiencing homelessness or are at imminent risk, would lose access to APS support entirely. Counties could also lose critical tools to coordinate housing interventions through multidisciplinary teams, reducing their ability to connect vulnerable individuals to stable housing and supportive services.

APS Reduction Will Lead to Social Worker Layoffs. One of the purposes of the APS expansion was to help counties keep pace with rapidly increasing caseloads. Reduction of this funding would result in the immediate elimination of social work staff who provide critical resources to keep older and dependent adults safe in their communities. The additional funding provided under AB 135 has enabled county APS programs to hire and retain social workers to provide more intensive, longer-term interventions. Eliminating this funding will force counties to scale back staffing – resulting in layoffs and increased caseloads for remaining social workers. This, in turn, will limit the ability to conduct thorough investigations. Without adequate staffing, APS agencies will be forced into a more reactive model, responding only to the most urgent crises rather than preventing harm and stabilizing individuals before situations escalate. Reducing APS staffing and capacity would significantly weaken the state's ability to protect some of its most vulnerable residents. Without sufficient staffing, even existing statutory requirements become increasingly difficult for counties to meet. Maintaining the APS expansion is critical not only to preserving services, but also to sustaining a workforce with the capacity to begin to meet the growing demand for protection, intervention, and support. Slashing current funding

[3] Kushel, M., et al. (2026), *Evaluation of the Home Safe Program*. UCSF Benioff Homelessness and Housing Initiative. https://homelessness.ucsf.edu/sites/default/files/2026-01/Home%20Safe%20Evaluation%20Report%20Final.pdf

will only worsen the situation.

The older adult population in California is rapidly growing. By 2030, one in four Californians will be 60 or older. According to California's Master Plan for Aging (MPA), one of the greatest threats to full inclusion for all ages is elder abuse. Reductions and eliminations to APS funding would undermine an essential piece of the MPA and the state's commitment to older adults. Additionally, it would result in immediate reductions of critical social work staff, the loss of critical services to protect older adults, and increases in the number of homeless older adults on our city streets.

While we appreciate that difficult decisions must be made considering the state's difficult budget situation, we must not address the budget shortfall at the expense of California's most vulnerable adults. We strongly urge the Legislature to maintain the state's commitment to vulnerable and older adults by rejecting the reduction to APS expansion dollars.

Sincerely,

Carlos Marquez III, Executive Director
County Welfare Directors Association

Justin Garrett, Senior Legislative Advocate
California State Association of Counties

Christina Mills, Executive Director
California Association of Area Agencies on Aging

Yasmin Peled, Director of California Government Affairs
Justice in Aging

Tom Scott, Executive Director
California State Association of Public Administrators, Public Guardians, Public Conservators

Karol Swartzlander, Executive Director
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Tiffany Whiten, Senior Government Relations Advocate
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Donata Bohanec, MPA, Executive Director
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Karen Jones, Executive Director/Program Manager
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Crista Barnett Nelson, Executive Director
Senior Advocacy Services

Kim Levy Rothschild, CAE, Executive Director
California Association of Public Authorities for IHSS

Jason Sullivan-Halpern, J.D., Association Director
California Long-Term Care Ombudsman Association

May 19, 2026

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

Dear Senate Budget Chair Laird, Assembly Budget Chair Gabriel, Senate Sub 4 Chair Hurtado, and Assembly Sub 5 Chair Quirk-Silva,

On behalf of the California State Association of Counties, League of California Cities, California Big City Mayors Coalition, and the Bring California Home Coalition, we are writing to share our response to the May Revision proposal for the Homeless Housing, Assistance and Prevention (HHAP) program. Our organizations are grateful for the ongoing partnership and investments in critical homelessness funding that is leading to reduced homelessness in communities. We offer these three recommendations to the proposed funding and implementation language, which will help strengthen our collective efforts and sustain progress in serving and providing housing to those in need.

1. Increase Funding Level to $1 Billion Ongoing

Our organizations are grateful for the continued inclusion of the previously committed $500 million for Round 7 of the program. However, this falls short of the need in our communities, especially with the numerous threats to reductions and restrictions for homelessness funding and housing supports at the federal level. The prior annual investments of $1 billion for HHAP are working and leading to significant progress with more than 100,000 people placed into permanent housing since 2023 and a reported over 9 percent reduction in unsheltered homelessness. Now is not the time to walk back from this commitment. Further, the program funding should not be lowered at the same time that requirements to access the funding continue to increase. Our coalition requests that HHAP funding be restored to the previous

funding level of $1 billion for this year and ongoing to meet the scale of the crisis and allow for long-term planning and commitments that will allow our local response to protect our progress.

2. Maintain Flexibilities and Streamlining

The proposed trailer bill language (TBL) for implementation of HHAP funding contains several flexibilities and streamlining provisions that our coalition has requested. We are appreciative of the recognition to enact new accountability measures in a manner that allows for demonstration of progress, multiple options for achieving compliance, and keeping funding in the region.

Most significantly, we are grateful that the Round 7 funding will be implemented through an amendment to the Round 6 notice of funding availability. Counties, cities, and continuums of care recently went through a comprehensive and lengthy process for the Round 6 applications and the development of regionally coordinated homelessness action plans. As drafted, this language allows communities to continue to utilize these collaborative plans that are designed to guide local homelessness efforts for multiple years.

Important flexibilities in the TBL include multiple avenues to meet compliance with state guidance on encampments and a period of one year to achieve the pro-housing designation after funding distribution. These provisions will maintain accountability while providing needed flexibility based on local resources and conditions.

Our organizations welcome the provision to keep unspent HHAP Round 1–3 funds within the HHAP program by making them available for reallocation to HHAP recipients. This is an important improvement that ensures homelessness dollars remain dedicated to homelessness solutions, rather than diverting away funds from the communities and programs they were intended to support.

3. Modify Requirements and Barriers that Slow Distribution of Funding

Our coalition is concerned that certain aspects of the TBL will delay funding from reaching communities. Accountability measures should not be implemented in a manner that creates barriers to securing funding, especially at a time of great uncertainty for individuals who rely on the safety net.

As proposed, Round 7 funding could not be distributed to a funded entity until they demonstrate that 75 percent of funding has been obligated, and 50 percent of funding has been expended, for the second disbursement of Round 6 funding. This provision directly contradicts the language agreed to last year (Chapter 650, Statutes of 2025) that aims to disburse Round 7 funding by September 1, 2026. The first disbursement of Round 6 funding only reached some regions of the state this month, nearly two years after it was adopted. Grantees are not able to

obligate or expend any amount of the second disbursement until they have actually received the funding and it will take significant time before any Round 6 second round disbursements occur. The purpose of the September 1 date was to get Round 7 funding out quickly because communities have already suffered from a year of no funding for HHAP. Our coalition has strong concerns with this provision, and requests clarifying changes so that Round 7 funding can be distributed on time and recipients are not held responsible for meeting obligation or expenditure thresholds on funds they have not yet received.

The HHAP TBL also includes a new requirement for a yet-to-be-determined local match amount for certain applicants. While local governments are committed to making investments for homelessness and housing, our organizations have strong concerns with a required local match. The federal administration is pursuing actions that may significantly reduce and restrict many of the essential funding streams that support services and housing assistance in our communities. Further, the entire safety net is under threat through the implementation of H.R. 1 that will result in fewer people experiencing or at risk of homelessness able to access health care or food support, increasing local costs and lead to far more falling into homelessness. The addition of a required local match at this time when so many local governments are facing dire budget strains will create barriers to funding reaching our communities. Thus, our coalition is seeking revisions to the local match provision to preserve the flexibility cities and counties need to address homelessness in ways that reflect the needs of their communities.

HHAP funding remains critically needed to support services, housing supports, shelters, and permanent housing in our communities, especially at a time of great risk for residents' health and safety. Our coalition remains committed to strengthening accountability for this funding, while also ensuring that it meets the needs of our communities, both in scale and timeliness. We look forward to continued engagement on this critical issue as the 2026-27 state budget is finalized. Thank you for your continued leadership and partnership.

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, Big City Mayors

Sharon Rapport
CSH, on behalf of
Bring California Home

May 19, 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: Maintaining Coverage for Vulnerable Californians: Alternative to Indigent Care Funding

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), County Health Executives Association of California (CHEAC), County Welfare Directors Association of California (CWDA), County Behavioral Health Directors Association of California (CBHDA), and the Service Employees International Union-California (SEIU California) write to request your leadership and partnership in addressing anticipated coverage losses resulting from federal work requirements and their impact on Medi-Cal eligible populations and county indigent care programs.

California has been a national leader in reducing the uninsured rate and expanding access to care following implementation of the Affordable Care Act. However, provisions in H.R. 1 threaten to reverse this progress. These changes put coverage at risk for more than one million Californians and will significantly increase the number of individuals who may turn to county indigent care programs which lack the resources to absorb this demand.

Counties serve as providers of last resort, delivering basic, often time-limited, medical care under their indigent care obligations. As Medi-Cal and Covered California expanded coverage, the state enacted AB 85 (Chapter 24, Statutes of 2013), which reduced available 1991 health realignment funding by slowing revenue growth and redirecting substantial funding to offset General Fund

costs. As a result, counties do not have the financial capacity to respond to a large-scale shift of newly uninsured residents without additional support.

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Recognizing the significant fiscal challenges facing the state and the difficult decisions before the Legislature, we acknowledge that alternative approaches to preserving access to care may need to be considered.

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This approach would:

- Ensure access to critical, life-saving care and stabilization services
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Thank you for your leadership and partnership as we work together to identify pragmatic, fiscally responsible solutions that preserve access to care and maintain coverage for California’s most vulnerable residents.

Sincerely,

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Beth Malinowski
Government Relations Advocate
SEIU California

cc: Honorable Members, Assembly Budget Committee
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Paula Villescaz, Office of Governor Gavin Newsom
Rosielyn Pulmano, Office of the Assembly Speaker
Christian Griffith, Assembly Budget Committee

Patrick Le, Assembly Budget Committee
Joe Shinstock, Assembly Republican Caucus
Eric Dietz, Assembly Republican Caucus
Jason Constantouros, Legislative Analyst's Office

May 19, 2026

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

The Honorable Caroline Menjivar
Chair, Senate Budget & Fiscal Review Subcommittee No. 3
1021 O Street, Room 6630
Sacramento, CA 95814

RE: Maintaining Coverage for Vulnerable Californians: Alternative to Indigent Care Funding

Dear Senator Laird and Senator Menjivar,

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Elisa Wynne, Senate Budget & Fiscal Review Committee

Scott Ogus, Senate Budget & Fiscal Review Committee
Kirk Feely, Senate Republican Caucus
Anthony Archie, Senate Republican Caucus
Jason Constantouros, Legislative Analyst's Office

CALIFORNIA COUNTIES

PROTECT OUR SAFETY NET

FOOD AND HEALTHCARE FOR FAMILIES

California State Association of Counties | RCRC | URBAN COUNTIES OF CALIFORNIA | CMSP COUNTY MEDICAL SERVICES PROGRAM | CWDA Advancing Human Services for the Welfare of All Californians | CHEAC Improving the Health of all Californians | CAPH California Association of Public Hospitals & Health Systems | cbhda County Behavioral Health Directors Association California

Updated County H.R. 1 Multi-Year Budget Request

The Governor's May Revision lacks any meaningful support for counties who must implement the requirements of H.R. 1. The proposal does not include any resources to support county indigent care, public hospital systems, or county behavioral health. While the May Revision includes modest one-time funding to support the county eligibility workforce to help individuals maintain their health care and food assistance benefits, it is far short of what is needed.

H.R. 1 represents a fundamental shift of fiscal responsibility for safety net programs from the federal government to states and counties, with counties facing increased costs ranging from $6 billion to $9.5 billion per year at full implementation. In March 2026, counties released an H.R. 1 Multi-Year Budget Request – $1.9 billion in 2026-27 and $4.5 billion in 2027-28 – to ensure individuals and families continue to have access to medical care, nutrition benefits, and behavioral health services.

The table below outlines California counties' **UPDATED** H.R. 1 Multi-Year Budget Request for the 2026-27 and 2027-28 fiscal years.

	Coalition Budget Request		May Revision		Updated Coalition Budget Request	
	2026–27	2027–28	2026–27	2027–28	2026–27	2027–28
Indigent Care / PATH Program[1]	$761 million	$2.4 billion	N/A	N/A	$50 million	$462 million
Public Hospital Systems	$500 million	$850 million	0	0	$500 million	$850 million
County Eligibility	$373 million	$402 million	$87 million	0	$300 million	$425 million
County Behavioral Health	$224 million	$828 million	0	0	$224 million	$828 million
TOTAL	**$1.9 billion**	**$4.5 billion**	**$87 million**	**0**	**$1.1 billion**	**$2.5 billion**

**All numbers are state General Fund.*

[1]Updated Coalition Budget Request reflects the development of new proposal to preserve access to health care for the indigent care population.

The lack of sufficient state funding to counties to implement H.R. 1 will cause irreparable harm to California's communities. Counties cannot deliver health care and food assistance services on behalf of the state without a significant financial investment from the state. County resources are finite and the more mandated H.R. 1 costs that are shifted to counties by the state without an influx of resources, the less funding that is available for other core services, such as public safety and elections.

Recognizing the significant fiscal challenges facing the State and the difficult decisions before the Legislature, alternative approaches to preserving access to health care may need to be considered. As an alternative to individuals who lose Medi-Cal coverage having to turn to unfunded county indigent care programs, counties recommend the state establish a limited, emergency-only Medi-Cal benefit for two-years. This will preserve health care access for more people while giving the state time to determine a long-term plan for maintaining recent gains in health care coverage.

Key Facts

- As the table above references, the May Revision does not include any General Fund allocations to address the impacts of H.R. 1 on county indigent care programs, public hospital systems, or county behavioral health systems. The May Revision only provides a total of $87.2 million GF in 2026-27 to support the eligibility workforce. This is only 5% of the total 2026-27 county budget request.

- According to the Legislative Analyst's Office, the uninsured rate in California is projected to double by 2030, with more than 2 million people losing health care coverage. The lack of funding in the May Revision to mitigate the impacts of H.R. 1 means this looming health care crisis is not being addressed.

May 21, 2026

The Honorable John Laird
Chair, Senate Budget and Fiscal Review Committee
1021 O Street, Suite 8630
Sacramento, CA 95814

The Honorable Laura Richardson
Chair, Senate Budget Subcommittee No. 5 on Corrections,
Public Safety, Judiciary, Labor and Transportation
1021 O Street, Suite 7340
Sacramento, CA 95814

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

The Honorable Steve Bennett
Chair, Assembly Budget Subcommittee No. 4 on Climate Crisis,
Resources, Energy and Transportation
1021 O Street, Suite 4710
Sacramento, CA 95814

RE: Opposition to the Governor's Sustainable Aviation Fuel (SAF) Diesel Excise Tax Credit Proposal – 2026-27 State Budget

Dear Chairs Laird, Richardson, Gabriel, and Bennett:

The undersigned coalition of organizations write to express our opposition to the proposed sustainable aviation fuel (SAF) diesel excise tax credit included in the Governor's January 2026-27 State Budget.

California's multimodal transportation system is facing an unprecedented and growing fiscal crisis. The 2025 State and Local Transportation Needs Assessment found that the estimated 10-year funding shortfall for state highways, local streets and roads, complete streets and active transportation, and transit and rail investments is $215.7 billion. This shortfall includes the projected loss of $31 billion over the same 10-year period due to increases in fuel efficiency and the transition to zero-emission vehicles. While fuel efficiency gains are good for the environment, the impact to funding has real consequences for the condition, safety, and reliability of the state's transportation network.

The SAF proposal would further reduce transportation revenues at a time when they are most needed. According to the Legislative Analyst's Office, the proposal could reduce diesel excise tax revenues by at least $165 million annually in the near term, potentially growing to approximately $300 million or more in future years. The proposed tax credit would be authorized through 2036, which translates to, at minimum, a $1.65 billion loss of revenue over the next decade. These losses would directly impact the State Highway Operation and Protection Program (SHOPP), local streets and roads, and the Trade Corridor Enhancement Program (TCEP), resulting in fewer critical safety, rehabilitation, active transportation, rail, zero-emission vehicle charging infrastructure, and freight mobility projects statewide.

This is particularly concerning given that the state is already delaying SHOPP projects due to rising costs and funding constraints. Further reductions will increase the backlog of maintenance and safety improvements, ultimately increasing long-term costs and reducing system reliability. The SAF proposal will accelerate the existing structural funding challenge at a time when the state is actively working to develop a more sustainable and equitable long-term transportation funding framework.

We strongly support California's climate leadership and the need to decarbonize all sectors, including aviation. However, the proposed funding mechanism undermines the long-standing user-pay, user-benefit approach that California voters have repeatedly endorsed. Diesel excise tax revenues are paid by truckers, transit agencies, and commercial vehicle operators to support the multimodal transportation system they rely on every day. Redirecting these revenues to subsidize aviation fuels raises serious concerns about fairness, transparency, and long-term sustainability.

For decades, California voters have supported constitutional protections to ensure transportation revenues are used for transportation purposes, including through Propositions 42, 1A, 22, and 69. The SAF proposal deviates from this long-standing framework and risks undermining public trust in transportation funding.

It is also important to recognize that aviation accounts for a relatively small share of statewide greenhouse gas emissions and that SAF production already benefits from significant state and federal incentives. The proposed credit represents a costly and comparatively inefficient approach to emissions reductions relative to other available strategies and may not produce the full environmental benefits anticipated.

For these reasons, the undersigned coalition respectfully urges the Legislature to reject the proposed SAF diesel excise tax credit and instead work with stakeholders to identify climate strategies that do not

compromise critical transportation investments. We appreciate your leadership and look forward to working with you to advance sustainable, equitable, and fiscally responsible transportation solutions for all Californians.

Should you have any questions about our position, please contact Jason Bryant, Transportation California's Legislative Advocate, at jason@bryantga.com or (916) 599-1826.

Sincerely,

Jason Bryant
Transportation California

Gus Flores
United Contractors

Todd Bloomstine
Southern California Contractors Association

Russell Snyder
California Asphalt Pavement Association

Chris O'Connor
Associated General Contractors

Matthew Connaroe
Western Regional Association for Pavement Preservation

Nick Chiappe
California Trucking Association

Vincenzo Caporale
California Association of Councils of Governments

Damon Conklin
League of California Cities

Anja Raudabaugh
Western United Dairies

Christopher Lee
Urban Counties of California

Voleck Taing
American Council of Engineering Companies California

Mahmoud Zahriya
AAA Mountain West Group (which includes Northern California)

Tim Chang
Auto Club of Southern California

Kirk Wilbur
California Cattlemen's Association

Robert Dugan
California Construction and Industrial Materials Association

Mark Neuburger
California State Association of Counties

cc: Honorable Members, Senate Budget and Fiscal Review Committee
Honorable Members, Senate Budget Subcommittee No. 5
Honorable Members, Assembly Budget Committee
Honorable Members, Assembly Budget Subcommittee No. 4
Christopher Francis, Staff Director, Senate Budget and Fiscal Review Committee
Joe Stephenshaw, Director, California Department of Finance
Myles White, Deputy Cabinet Secretary, Office of Governor Gavin Newsom
Trey Reffitt, Deputy Legislative Secretary, Office of Governor Gavin Newsom

May 19, 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: Maintaining Coverage for Vulnerable Californians: Alternative to Indigent Care Funding

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), County Health Executives Association of California (CHEAC), County Welfare Directors Association of California (CWDA), County Behavioral Health Directors Association of California (CBHDA), and the Service Employees International Union-California (SEIU California) write to request your leadership and partnership in addressing anticipated coverage losses resulting from federal work requirements and their impact on Medi-Cal eligible populations and county indigent care programs.

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Elisa Wynne, Senate Budget & Fiscal Review Committee

Scott Ogus, Senate Budget & Fiscal Review Committee
Kirk Feely, Senate Republican Caucus
Anthony Archie, Senate Republican Caucus
Jason Constantouros, Legislative Analyst's Office

May 15, 2026

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

RE: AB 1549 (Krell) Alternative domestic violence program.
As introduced January 7, 2026 – CO-SPONSOR

Dear Senator Arreguín,

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.

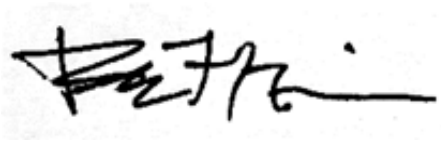
To date, the work under AB 372 has led to local batterer intervention program modifications, curriculum advancements, briefs on California's domestic violence system, recidivism research, and annual reporting. After the first five years of implementation, over 6,900

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
rmorimune@counties.org

Danielle Sanchez
Legislative Director, CPOC
danielle@wpssgroup.com

Kim Stone
Lobbyist, CDAA
kim@stoneadvocacy.com

CC: The Honorable Maggy Krell, California State Assembly
Members and Consultants, Senate Public Safety Committee
Eric Csizmar, Consultant, Senate Republican Caucus

May 12, 2026

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

Re: **AB 1954: Municipal golf courses: reservations**
Notice of SUPPORT *(As Amended 4/21/2026)*

Dear Assembly Member Wicks,

The League of California Cities and the California State Association of Counties are pleased to support your AB 1954, which would prohibit an operator of a third-party golf reservation service platform from listing, advertising, promoting, selling, or transferring reservations for a golf course operator without a written agreement.

Unauthorized third-party reservation services charge higher rates and make it difficult for residents to book tee-times at municipal courses where fees are kept affordable to ensure access to residents. Many of these third-party brokers are using sophisticated websites and paying for search engine optimization, which confuses consumers who do not intend to use these platforms.

AB 1954 is a commonsense approach that will provide local jurisdictions with the option to pursue legal action against these platforms operating without an agreement. Currently, municipalities have minimal legal standing to stop unauthorized third-party reservation services and cease and desist orders are commonly ignored.

Our organizations appreciate your leadership on this issue and look forward to working with your office. If you have any questions, do not hesitate to contact us at cgrinder@calcities.org or cdelgado@counties.org.

Sincerely,

Caroline Grinder
Legislative Advocate
League of California Cities

Charles Delgado
Legislative Advocate
California State Association of Counties

May 12, 2026

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

Re: **AB 2064 (Sharp-Collins): Discrimination: criminal history.**
As amended April 9, 2026 – OPPOSE

Dear Chair Wicks,

On behalf of the California Special Districts Association (CSDA), California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), and the Association of California School Administrators (ACSA), we write in respectful opposition to Assembly Bill (AB) 2064 (Sharp-Collins), which would add criminal history as a protected characteristic under the Unruh Civil Rights Act (UCRA) and the Fair Employment and Housing Act (FEHA).

The sponsors of AB 2064 have not made public employers aware of examples where existing law is not working to protect applicants in their workplaces. Despite the lack of demonstrated need for this bill in the public sector, AB 2064 would severely interfere with public agencies' obligations to provide safe workplaces for employees and the public, including vulnerable populations, while exposing well-intentioned public agencies to significant litigation risk.

Public Agencies Are Different

While we appreciate the concerns underlying this measure, the proposed solution of creating a new protected characteristic under FEHA, in particular, fails to account for the unique aspects of public employment and responsibilities of public agencies. Public agencies are implementing the requirements of Senate Bill 553 (Cortese, 2023), which includes obligations aimed at preventing workplace violence and harassment, and ensuring workplace safety. Public agencies maintain critical infrastructure, jails, fire and police stations, hospitals, parks, libraries, and schools. Virtually all public employees are Disaster Service

Workers pursuant to Government Code Section 3101, and may be called upon to respond to emergencies. These roles and responsibilities often require public employees to work alone or with little support. Public employees must maintain operations, the failure of which could place entire communities in danger. Public employees' responsibilities place them in proximity to vulnerable populations such as patients, students and children, incarcerated individuals, people experiencing homelessness, victims of violence or disaster, and the elderly. Simply put, public agencies' responsibilities are too great, and the consequences of failure too dire, to add ambiguity, additional liability, and litigation risk to the performance of their core operations, without a demonstrated need.

AB 2064 Would Trade Clear Rules for Ambiguity, Exposing Well-Intentioned Public Agencies to Litigation

Robust frameworks under existing law provide clear rules of the road and ensure that applicants are given fair consideration and that criminal history background checks are conducted in a focused manner. Existing law, Government Code Section 12952, provides detailed requirements for employers to question or investigate an applicant's conviction history in connection with positions for which a conviction history background check is required by law, and for other positions. Public employers have not been provided with examples of this framework failing to work properly in their workplaces.

AB 2064 would create ambiguity and additional legal liability exposure by adding criminal history as a new protected characteristic under FEHA (and UCRA), with all of the attendant rights, duties, and remedies. Application of the full suite of FEHA protections to criminal history, on top of the existing framework under the Fair Chance Act, results in significant uncertainty regarding public agencies' legal obligations – and regarding their ability to continue effectively protecting the public and providing public services. Public employers will be exposed to litigation risk with multiple statutory frameworks that do not fully align, and the careful balance struck in the Fair Chance Act will be undermined. While AB 2064 attempts to partially correct for this by providing narrow exceptions in Section 5 of the bill, the exceptions only serve to highlight the risks posed by the measure.

Proposed Government Code Section 12940(s)(1) makes clear that the provisions of the part relating to discrimination on the basis of criminal history are *in addition* to those in Section 12952, reinforcing public agency concerns about ambiguity and potential liability under new frameworks.

The goals of this measure are laudable. However, the current framework provides significant protections to ensure that applicants for hiring and

promotion are given fair consideration while balancing the unique service delivery provided by public agencies. Given the lack of evidence that existing protections are insufficient in their workplaces, any potential benefits of this measure are outweighed by the risks and costs.

For these reasons, we are **opposed** to AB 2064 and urge your "NO" vote. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties
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

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

CC:
The Honorable LaShae Sharp-Collins
Honorable Members, Assembly Appropriations Committee
Shiran Zohar, Principal Consultant, Assembly Appropriations Committee
Liz Enea, Consultant, Assembly Republican Caucus

May 12, 2026

The Honorable LaShae Sharp-Collins
California State Assembly
1021 O Street, Suite 4130
Sacramento, CA 95814

Re: **AB 2064 (Sharp-Collins): Discrimination: criminal history.**
As amended April 9, 2026 – OPPOSE

Dear Assembly Member Sharp-Collins,

On behalf of the California Special Districts Association (CSDA), California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), and the Association of California School Administrators (ACSA), we write in respectful opposition to Assembly Bill (AB) 2064 (Sharp-Collins), which would add criminal history as a protected characteristic under the Unruh Civil Rights Act (UCRA) and the Fair Employment and Housing Act (FEHA).

The sponsors of AB 2064 have not made public employers aware of examples where existing law is not working to protect applicants in their workplaces. Despite the lack of demonstrated need for this bill in the public sector, AB 2064 would severely interfere with public agencies' obligations to provide safe workplaces for employees and the public, including vulnerable populations, while exposing well-intentioned public agencies to significant litigation risk.

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The goals of this measure are laudable. However, the current framework provides significant protections to ensure that applicants for hiring and

promotion are given fair consideration while balancing the unique service delivery provided by public agencies. Given the lack of evidence that existing protections are insufficient in their workplaces, any potential benefits of this measure are outweighed by the risks and costs.

For these reasons, we are respectfully opposed to AB 2064. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties
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

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

May 12, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
State Capitol, Room 412
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 Appropriations Committee May 4, 2026

Dear Chair Cervantes,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), League of California Cities (CalCities), California Special Districts Association (CSDA), and the Association of California School Administrators (ACSA), 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 all California public agencies 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.

SB 1319 could cause California's pension systems to lose an investment opportunity that typically has an expected investment return above the discount rate. That would likely cause the systems to reduce their discount rate accordingly, causing direct cost increases for the state, all local agencies and schools, and public employees. These costs could easily reach billions for public agencies.

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

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

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.

Enhances pressure on public agencies

Public agencies are facing considerable cost pressure from all fronts and SB 1319 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multimillion dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

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

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

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

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

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

CC: The Honorable Maria Elena Durazo
Members, Senate Appropriations Committee
Bob Franzoia, Consultant, Senate Appropriations Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

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

May 12, 2026

Ms. Susan DeMarois, Director
California Department of Aging
2880 Gateway Oaks Dr., Suite 200
Sacramento, CA 95833

Submitted via email: CA2030@aging.ca.gov

RE: Comments on the Intrastate Funding Formula Proposal

Dear Director DeMarois,

On behalf of the California State Association of Counties (CSAC), I am writing to share our comments on the proposed changes to the Intrastate Funding Formula (IFF). Counties are grateful to the California Department of Aging (CDA) for leading a collaborative multiyear effort to transform the state's aging system to better prepare for the growing number of older adults.

Counties play a critical role in providing services and administering programs for our state's aging population. There are 19 counties that directly administer their Area Agency on Aging (AAA) and the other counties partner with their local AAAs on ensuring the needs of their communities are met. These services are especially vital as the state's population of older adults will significantly increase in the coming years.

Updating the IFF is a key component of modernizing the state's aging network and one of the requirements of Senate Bill 1249 (Chapter 337, Statutes of 2024). CSAC appreciates CDA's goals in updating this formula to look at a variety of key factors, ensure equity, and align with needs across the state. However, CSAC does have several concerns with the proposed updated formula.

The updated IFF will alter the funding levels for all AAAs, with some receiving large increases while others see significant funding declines. A guiding principle for CSAC's engagement on county-by-county funding distributions is that there should be the inclusion of a hold harmless provision to current funding levels where possible, which is not included in this proposal. Modified funding formulas should then apply to any

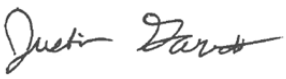
CSAC Officers | **President** Susan Ellenberg, Santa Clara County | **1st Vice President** Luis Alejo, Monterey County | **2nd Vice President** Kent Boes, Colusa County | **Past President** Jeff Griffiths, Inyo County | **CEO** Graham Knaus

increased funding. This helps ensure that counties can rely on and plan for the multiyear operation of a certain level of programs and services and then any needed formula changes can phase in with additional funding that is provided. Increased funding is especially critical for aging services given how fast the state's aging population is growing and that older adults are living for longer.

CSAC is concerned that if this updated IFF is not implemented with increased funding, then there will be disruptions to services in certain communities. Absent additional funding, the changes proposed in this IFF would simply shift limited resources among communities that all rely on this critical funding. There is a growing need for aging services, yet counties are facing significant budget constraints for health and human services programs. These strains are compounded by the implementation of federal H.R. 1 that is estimated to cost counties up to $9.5 billion annually. The implementation of a revised IFF at this time that will result in some AAAs having reduced funding will create risks to the key aging services needed in these communities.

Thank you for the opportunity to submit comments and we look forward to continued engagement on this important issue. Counties appreciate the ongoing partnership with CDA to strengthen the programs that serve our state's older adults.

Sincerely,



Justin Garrett
Senior Legislative Advocate

April 28, 2026

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

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

Dear Assemblymember Wicks:

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. Constitutions 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 does 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, which would create 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 to 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 the language, "*upon appropriation of funds from the Legislature*" 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 of the Assembly Appropriations Committee
Jennifer Swenson, Principal Consultant, Assembly Appropriations Committee
Tobias Wolken, Consultant, Assembly Republican Caucus

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

May 6, 2026

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

RE: SB 926 (Strickland) Public safety: Funding of Proposition 36 Act.
As amended April 23, 2026 – SUPPORT
Set to be heard in the Senate Appropriations Committee May 11, 2026

Dear Senator Cervantes,

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 require that funding be administered via an equitable grant program by the Board of State and Community Corrections for implementation of Proposition 36 (2024) in fiscal year 2026-27. 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 fund the continued administration 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 the critical county workforce by establishing a fund for counties to meet the intent of Proposition 36 and the will of California voters who overwhelmingly approved the ballot initiative.

CSAC Officers

President
Susan Ellenberg
Santa Clara County

1st Vice President
Luis Alejo
Monterey County

2nd Vice President
Kent Boes
Colusa County

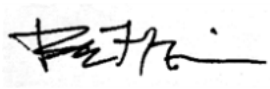
Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

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 ecosystem. 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 Appropriations Committee
Liah Burnley, Senate Appropriations Committee
Eric Csizmar, Senate Republican Caucus

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

May 4, 2026

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

RE: AB 1559 (Calderon) Residential property insurance images.
As amended on April 13, 2026 - SUPPORT
To be heard in the Assembly Appropriations Committee on May 6, 2026

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 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.

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

CC: The Honorable Lisa Calderon, Member of the California State Assembly
Members, Assembly Appropriations Committee

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

May 7, 2026

SENATE FLOOR ALERT

Senate Bill 997 (Caballero) – North Fork Kings Groundwater Sustainability Agency: lien authority.

As Amended April 30, 2026 – **SUPPORT**

Dear Honorable Members of the California State Senate,

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,

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

OFFICERS

President
Susan Ellenberg
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Luis Alejo
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2nd Vice President
Kent Boes
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Past President
Jeff Griffiths
Inyo County

CEO
Graham Knaus

May 5, 2026

The Honorable Monique Limón
Senate President pro Tempore
Chair, Senate Rules Committee
State Capitol, Room 400
Sacramento, CA 95614

RE: Appointment of Dorene D'Adamo, State Water Resources Control Board – SUPPORT

Dear President pro Tempore Limón,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in California, I write in support of the reappointment of Dorene D'Adamo to the State Water Resources Control Board (State Water Board).

California counties are dedicated partners in addressing the state's complex water challenges. Counties oversee drinking water services to some of the state's most vulnerable communities; participate in coalitions implementing the Irrigated Lands Regulatory Program and CV-SALTS; serve as Groundwater Sustainability Agencies under the Sustainable Groundwater Management Act (SGMA); lead on stormwater management permit compliance; and partner on many other initiatives vital to ensuring the preservation of our valuable water resources. As water stakeholders, we work frequently with the members of the State Water Board, and their dedicated staff.

Vice Chair D'Adamo has a proven record of leadership at the State Water Board. Her expertise and experience allow her to understand the diverse viewpoints of our membership, which represents every Californian. She is a trusted policy expert that has ensured that constituencies as varied as urban water users, farmers, tribes, disadvantaged communities, conservationists, and all others are part of the state decision-making process, and that their voices are heard.

The continued service of Vice Chair D'Adamo will be vital to the next steps in California water policy; the continued implementation of SGMA, evaluating the recommendations of the Second Statewide Agricultural Expert Panel, securing the Human Right to Water through the newly-reauthorized SAFER Program, modernizing the water rights system, and adapting to climate change.

OFFICERS

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Jeff Griffiths
Inyo County

CEO
Graham Knaus

We support the confirmation of Vice Chair D'Adamo and look forward to continuing to work with her to serve the people of California. If you have any questions about our position, please contact me at cdelgado@counties.org.

Sincerely,

Charles Delgado
Legislative Advocate
California State Association of Counties

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

May 4, 2026

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

RE: AB 1577 (Bauer-Kahan) Data centers: reporting.
As amended on April 13, 2026 – SUPPORT
To be heard in the Assembly Appropriations Committee on May 6, 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 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.

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,

Jordan Wells
Legislative Advocate
California State Association of Counties

CC: The Honorable Rebecca Bauer-Kahan, Member of the California State Assembly
Members, Assembly Appropriations Committee

May 5, 2026

The Honorable Buffy Wicks
Chair, Assembly Committee on Appropriations
1021 O Street, Suite 8220
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 Appropriations on May 6, 2026

Dear Chair Wicks,

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 develop or use artificial intelligence (AI) tools that can improve service delivery, increase government efficiency, and replace rote tasks with more meaningful work.

AB 2027 would impose immediate and significant costs on all public agencies in California. Every public agency, including every county, city, school district, special district, and state agency, would be required to conduct immediate compliance assessments over a three-month period before the bill takes effect. Because the bill refers to definitions in the California Consumer Privacy Act (CCPA), public agencies would have a rapid deadline to interpret a law that has never applied to them. Most critically, agencies would be required to cease training existing AI systems with the aid of the public workforce and could be compelled to cease efforts to procure, develop, or implement new technology.

In addition to direct costs, this bill could have profound indirect costs for public agencies, muting the benefits of technologies that are already helping to improve

service delivery for Californians and to amplify the ability of government agencies to protect the public. To name just one example, a county welfare office may be required to cease using tools that simplify public benefit enrollment, causing frustration by the public who needs access to social safety services and adding to further strain to an already strained system.

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.

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

Public agencies are not governed by the 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.

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;
- Perform road maintenance triage, detection of road hazards, and identification of potholes;
- Detect wildfires and earthquakes;
- Monitor dam safety;
- Detect leaks for water pipelines;
- Improve efficiency for public benefit enrollment and pupil attendance monitoring; 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
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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Irene Ho, Deputy Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

May 1, 2026

The Honorable Buffy Wicks, Chair
Assembly Appropriations Committee
1021 O Street, Suite 8150
Sacramento, CA 95814

Re: **AB 2224 (Hadwick): County recorders: fees**
As amended 3/17/25 – SUPPORT
Awaiting hearing – Assembly Appropriations Committee

Dear Assembly Member Wicks:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Counties (CSAC), we write to share our support for Assembly Bill 2224, a measure that updates and modernizes the statutory fees for county recorders' services. Across the state, county recorders provide important public services and serve as the custodian of vital records, recorded land documents, and other legal documents that support the integrity of property ownership and other legal transactions.

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

AB 2224 updates the maximum fee a county recorder may charge for recording the first page of a document from $10 to $15 and additional pages from $3 to $4. These proposed adjustments are consistent with relative increases in the Consumer Price Index and still must reflect cost recovery. In addition, each county will be required to move to an electronic recording delivery system, which will allow the elimination of outdated fees. Further, AB 2224 requires that the fees collected are dedicated to, and solely utilized for, the county recorder's office, and prohibits the fees from exceeding the reasonable costs of the document recording function. While counties generally would prefer flexibility in directing such fees, the county recorders' offices fees are so woefully out of date, we recognize the utility of such a provision.

AB 2224 is an important measure to ensure that services provided by county recorders' offices are not subsidized by the general public through a reasonable update to statutory maximum fees. We greatly appreciate your "aye" vote on this important measure.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
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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

cc: Members and Consultants, Senate Local Government Committee
The Honorable Heather Hadwick, California State Assembly

May 1, 2026

The Honorable Buffy Wicks, Chair
Assembly Appropriations Committee
1021 O Street, Suite 8150
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 Appropriations Committee

Dear Assembly Member Wicks:

On behalf of the Urban Counties of California, the Rural County Representatives of California, the California State Association of Counties, the California Special Districts Association, and the League of California Cities, we write to share our opposition to 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

Johnnie Pina
Legislative Affairs, Lobbyist
League of California Cities

cc: The Honorable Jessica Caloza, California State Assembly
Members and Consultants, Assembly Appropriations Committee

May 4, 2026

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

Re: **Assembly Bill 2545 (Schiavo). Report: labor force impact: artificial intelligence.**
As Amended April 14, 2026 - Support if Amended
To be heard in the Assembly Appropriations

Dear Chair Wicks

On behalf of the California State Association of Counties (CSAC) and Urban Counties of California (UCC), League of California Cities (Cal Cities), and the Association of California School Administrators (ACSA), 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.

We respectfully request that a local agency employer representative 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 and avoid potential future costs or unfunded mandates for local governments. While we have concerns regarding other legislation that is designed to limit, regulate, or prohibit new technologies in the workplace, AB 2545 takes better approach: evaluate the impacts of AI systems analytically before imposing new restrictions.

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
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Jean Hurst
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Urban Counties of California
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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 Pilar Schiavo, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Irene Ho, Deputy Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director Assembly Republican Caucus

May 4, 2026

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

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As amended April 9, 2026 – SUPPORT
To be heard in Assembly Appropriations on May 6, 2026

Dear Chair Wicks:

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
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Senior Policy Advocate
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Marcus Detwiler
Legislative Representative
California Special Districts Association
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CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Assembly Appropriations Committee
Jennifer Swenson, Principal Consultant, Assembly Appropriations Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

May 4, 2026

The Honorable Buffy Wicks, Chair
Assembly Appropriations Committee
1021 O Street, Suite 8150
Sacramento, CA 95814

Re: AB 2656 (Petrie-Norris): Public Employees: notice: artificial intelligence performing service within the scope of work
As amended 4/14/26 – OPPOSE
Awaiting hearing – Assembly Appropriations Committee

Dear Assembly Member Wicks:

On behalf of the Urban Counties of California (UCC), the California Special Districts Association, the Rural County Representatives of California, the California State Association of Counties, the California Association of Recreation and Park Districts, Public Risk Innovation, Solutions, and Management (PRISM), the League of California Cities, and the Association of California School Administrators, 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. As a result, we seek amendments to clarify more precisely the language as to when notification is required.

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 unless it is amended to provide clarity and specificity as to when notification is to be provided. 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
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California State Association of Counties

Ethan Nagler
Legislative Representative
California Association of Recreation and Park Districts

Jason Schmelzer
Legislative Advocate
Public Risk Innovation, Solutions, and Management (PRISM)

Johnnie Pina
Legislative Affairs, Lobbyist
League of California Cities

Dorothy Johnson
Legislative Advocate
Association of California School Administrators

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

May 8, 2026

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

Re: SB 1329 (McNerney): Real property tax: valuation: active solar energy system.
As amended March 23, 2026 – OPPOSE
To be heard in Senate Appropriations on May 11, 2026

Dear Chair Cervantes:

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC), we write in respectful opposition to Senate Bill 1329 (McNerney), which would establish a new assessment process for certain solar energy systems for purposes of calculating property tax revenues owed to local schools, counties, cities, and special districts. While we appreciate that the solar industry acknowledges that its need for significant subsidy by local agencies no longer exists, this bill would significantly alter the valuation of active solar energy systems for property tax purposes, and we share many of the concerns outlined by the California Assessors' Association.

California's solar industry is thriving by anyone's measure. Regrettably, while the continued extension of the existing tax exclusion has clearly benefited solar investors, it has done so at the expense of local agencies – and, in many cases, those local agencies least able to afford it. Preliminary analysis indicates value reductions for these solar energy systems could exceed 40 percent, resulting in significantly less revenues for counties that would otherwise be used to support public safety, fire protection, libraries, parks, and essential health and human services.

With the passage of H.R. 1, we 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, reduces potential revenues, or that places additional workload pressures on counties.

We remain committed to continued dialogue with the author, the industry, and other stakeholders to ensure that assessments of solar energy systems fairly reflect their value and that local agencies, who have borne the burden of hosting such systems with little economic advantage, begin to benefit from the siting of such systems in their communities.

For these reasons, we are respectfully opposed to SB 1329. Should you have any questions regarding our position, please do not hesitate to contact us.

Sincerely,

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Senior Policy Advocate
Rural County Representatives of California
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Jean Kinney Hurst
Legislative Advocate
Urban Counties of California
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CC: The Honorable Jerry McNerney, California State Senate
Members and staff, Senate Appropriations Committee
Robert Ingenito, Senate Appropriations Committee
Kirk Feely, Fiscal Director, Senate Republican Caucus

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

May 8, 2026

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

RE: Assembly Bills Suspense Recommendations

Dear Chair Wicks,

The California State Association of Counties (CSAC), proudly representing all 58 California counties, writes to share the county perspective on pending legislation before your committee. We acknowledge the considerable work ahead and the difficult decisions that must be made given the state's current fiscal condition and impacts from federal budget cuts.

With the passage of H.R. 1, CSAC is 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.

Likewise, California Counties are concerned about legislation that imposes additional complex and cumbersome mandated duties without providing a specific funding source for implementation. Specifically, we are concerned that additional state-imposed requirements or new programs will further strain already limited resources needed to support California's communities, particularly our most vulnerable populations.

CSAC's recommendations are based on maintaining the fiscal health of counties and improving the delivery of services to California's communities. Therefore, we respectfully make the following recommendations for the Appropriations Committee's May Suspense Hearing.

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

Opposition Bills

Counties respectfully request the following bills be held on the committee's suspense file**.**

Environmental Safety and Toxic Materials

- **AB 2170 (Boerner) California Environmental Quality Act (CEQA): overburdened communities: notices and hearings: translations**
  Imposes significant new expenses on local governments to provide expansive new translation services related to CEQA hearings, as well as associated costs from increased permitting activities generated by the revocation of statutory exemptions and heightened regulatory thresholds across large areas of the state.

- **AB 2569 (Hart) California Environmental Quality Act (CEQA): natural hazards and adverse environmental conditions.**
  Results in extensive new costs to CEQA lead agencies that must evaluate greatly heightened regulatory standards around mitigation for natural hazards and adverse environmental conditions.

Governmental Organization

- **AB 1754 (Pacheco) State general obligation bonds: requirements.**
  Delays much-needed public infrastructure projects and diverts taxpayer resources toward administrative costs by requiring all state agencies administering general obligation bond funding to develop and administer substantial new tracking and reporting requirements. This measure would result in substantial new costs related to the increased reporting requirements across dozens of state agencies and would also impose new costs on project proponents who will have to collect and report more data.

Housing and Community Development

- **AB 1859 (Ortega) Public works.**
  Grants third-party Joint Labor-management Committee's (JLMCs) a statutory right of access to public works job sites, private right of action, civil penalties, and attorney's fees against public agencies for alleged denial of access, substantially increasing risk of litigation for counties. This increased exposure could divert limited public resources from critical infrastructure and community services, disproportionately burden smaller counties with limited staffing and legal capacity, and increase project costs as public agencies and contractors are forced to incorporate higher risk premiums into bids. Overall, this measure ultimately raises project costs for taxpayers and reduces the extent and quality of infrastructure that can be completed with limited public dollars.

Judiciary

- **AB 2605 (Arambula) State Public Defender: county public defenders: data collection.**
  Proposes that counties collect specified information with regards to indigent defense and report the information and data to the Office of the State Public Defender every two years. This bill would establish new, ongoing reporting and workload requirements on counties, which would divert already limited local resources away from essential services, including the provision of constitutionally mandated legal representation.

Labor and Employment & Privacy and Consumer Protection

Several bills restrict workplace technology in ways that create significant new costs and liabilities for public agencies. These costs include extensive compliance measures and administrative burdens, as well as direct liability for legal fees, defense costs, and direct fines. These bills can also limit the effectiveness of public agencies to provide essential services, including public benefit enrollment, wildfire detection, or safety monitoring for critical infrastructure.

- **AB 1883 (Bryan) Workplace surveillance tools.**
  Restricts the use of tools that can infer information about protected activities or use facial recognition.

- **AB 1898 (Schultz) Workplace artificial intelligence tools.**
  Requires 90-day advance notice of a wide variety of tools that use artificial intelligence (AI) or automated decision-making systems (ADS), including security systems, and requires notice to include wide array of information, including locations, make and model, and job activities to be monitored.

- **AB 2027 (Ward) Worker data: prohibitions: artificial intelligence.**
  Restricts agencies from training AI systems with worker data, effectively limiting or banning the use of AI tools.

- **AB 2656 (Petrie-Norris) Public employees: notice: artificial intelligence performing service within scope of work.**
  Requires public agencies to notify employees within 45 days of developing, implementing, utilizing, or purchasing AI to perform a service within an employee's scope of work.

CSAC Officers

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Jeff Griffiths	Susan Ellenberg	Luis Alejo	Bruce Gibson	Graham Knaus
Inyo County	Santa Clara County	Monterey County	San Luis Obispo County	

Also, CSAC has fundamental concerns with bills that aim to restrict how public agencies can use tools that improve service delivery or provide security for the public we serve or the public workforce. It is critical that legislation in this area does not impose a "one size fits all" approach as public agencies have different responsibilities and missions than private entities. 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 most public employees have a property interest in their position that is protected by due process[1].

Transportation:

- **AB 1820 (Schiavo) Electric vehicle charging stations: permit fees.**
  Undermines the fundamental cost-recovery framework that enables local governments to efficiently and safely permit critical electric vehicle charging infrastructure. AB 1820 departs from longstanding principles by imposing a $500 cap, plus limited per-kilowatt adders that fall below the actual cost of permit processing, plan review, and inspection that counties incur. which can reach several thousand dollars for complex installations. Some cost estimates indicate that this cap could result in $12 million in lost recovery revenue, reducing resources that would support the inspection workload association with the installation of the chargers.

<u>Support Bills</u>

Counties respectfully request the following bills be removed from the committee's suspense file and move to the Assembly floor for a vote.

Environmental Safety and Toxic Materials

- **AB 2462 (Pellerin) Unsafe products: disposal: penalties. (CSAC Sponsor)**
  Updates the Product Recall Safety and Protection Act (Chapter 569, Statutes of 2008), which added state requirements to any manufacturer facing a federal recall. This measure established that manufacturers are responsible for providing the safe return, repair, or disposal of a recalled product at no-cost, for consumers and retailers, as well as solid waste, household hazardous waste, recycling centers, and other specified locations. This measure ensures that local jurisdictions will no longer bear the cost of disposing of recalled products.

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

Health

- **AB 2201 (Boerner) Medi-Cal: eligibility redetermination.**
  Reinstates four Medi-Cal renewal streamlining strategies to help minimize inappropriate disenrollment of Medi-Cal enrollees: (1) auto-verification of zero income; (2) auto-verification of income at or below 100% of the federal poverty level; (3) auto-verification of stable income and assets; and (4) streamlined Asset Verification System workflows. By automating eligibility processes, this measure is likely to reduce county administrative workload and associated costs.

Local Government

- **AB 2640 (Hadwick) Commission on State Mandates: state mandates.**
  Authorizes the State 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 ensures local governments can retain critical funding and obtain needed financial relief.

Water, Parks and Wildlife

- **AB 2739 (Soria) Water: affordability and system stabilization.**
  Creates a framework for low-income rate assistance funding to support drinking water ratepayers and helps to realize California's statutorily recognized Human Right to Water by stabilizing rate bases for disadvantaged communities throughout the state. This will ensure access to clean and affordable drinking water for all Californians and help establish more reliable finances for water districts and providers, many of which are small and lacking in the economies of scale necessary to maintain critical infrastructure and services.

CSAC appreciates the continued engagement to strengthen state and local relationships, and to realize the opportunities to safeguard fiscal resources to best support the people we collectively serve. In addition to these comments, we have sent individual letters on each bill with more detail. If you have any questions, please do not hesitate to contact me at krodriguez@counties.org. Thank you for your consideration.

CSAC Officers

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

Respectfully,

Kimberly Rodriguez
Chief Legislative Advocate, CSAC

CC: Honorable Robert Rivas, Speaker of the Assembly
Honorable Members of the Assembly Appropriations Committee
Steve O'Mara, Chief of Staff, Speaker Robert Rivas
Monica Henestroza, Policy Director, Speaker Robert Rivas
Jay Dickenson, Chief Consultant, Assembly Appropriations Committee

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

May 8, 2026

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

RE: Senate Bills Suspense Recommendations

Dear Chair Cervantes,

The California State Association of Counties (CSAC), proudly representing all 58 California counties, writes to share the county perspective on pending legislation before your committee. We acknowledge the considerable work ahead and the difficult decisions that must be made given the state's current fiscal condition and impacts from federal budget cuts.

With the passage of H.R. 1, CSAC is 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.

Likewise, California Counties are concerned about legislation that imposes additional complex and cumbersome mandated duties without providing a specific funding source for implementation. Specifically, we are concerned that additional state-imposed requirements or new programs will further strain already limited resources needed to support California's communities, particularly our most vulnerable populations.

CSAC's recommendations are based on maintaining the fiscal health of counties and improving the delivery of services to California's communities. Therefore, we respectfully make the following recommendations for the Appropriations Committee's May Suspense Hearing.

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Opposition Bills

Counties respectfully request the following bills be held on the committee's suspense file.

Behavioral Health

- **SB 1016 (Blakespear) Community Assistance, Recovery and Empowerment (CARE) Court Program and court ordered evaluations.**
  Authorizes a CARE Court petitioner to request the court order a mental health conservatorship evaluation under the Lanterman-Petris-Short (LPS) Act if the petitioner believes that the person may not be willing or able to participate in CARE Court. This measure would likely impose new costs on county behavioral health departments to perform additional LPS conservatorship evaluations.

Labor, Public Employment and Retirement & Privacy, Digital Technologies, and Consumer Protection

Several bills restrict workplace technology in ways that create significant new costs and liabilities for public agencies. These costs include extensive compliance measures and administrative burdens, as well as direct liability for legal fees, defense costs, and direct fines. These bills can also limit the effectiveness of public agencies to provide essential services, including public benefit enrollment, wildfire detection, or safety monitoring for critical infrastructure.

- **SB 947 (McNerney) Employment: automated decision systems.**
  Regulates employers' use of ADS by limiting the purposes when it may be used, requiring post-use notices to affected workers when ADS are used in discipline, termination or deactivation decisions, and establishing enforcement and penalties for violations.

- **SB 951 (Reyes) Employment: technological displacement: notice**.
  Requires public agencies to notify workers at least 90 days before a layoff related to adoption of AI or ADS. Failure to notify would cause an employer to be liable for lost wages, health costs, and a direct fine of $500 per day.

Also, CSAC has fundamental concerns with bills that aim to restrict how public agencies can use tools that improve service delivery or provide security for the public we serve or the public workforce. It is critical that legislation in this area does not impose a "one size fits all" approach as public agencies have different responsibilities and missions than private entities. 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 most public employees have a property interest in their position that is protected by due process[1].

Public Employment and Retirement

- **SB 1319 (Durazo) California Public Records Act: public investment funds.**
  Requires the California pension funds to disclose specified information about private equity investments, resulting in limited and likely lower quality investment options for CalPERS, CalSTRS, every '37 act system, and any other public pension system in California. CalPERS estimates the measure would compel them to reduce their discount rate by 50 basis points, causing an immediate and annual multi-billion dollar increase in contribution rates for public agencies.

Support Bills

Counties respectfully request the following bills be removed from the committee's suspense file and move to the Assembly floor for a vote.

Natural Resources and Water

- **SB 872 (McNerney) Delta Levees and Canal Subsidence Fund.**
  Protects the millions of water users in the state, communities reliant on safe, clean drinking water, and the environment by making long overdue investments in the State Water Project and the network of levees protecting the Sacramento-San Joaquin Delta.

- **SB 1001 (Archuleta) Local agency, public utility, or mutual water company: personnel access: Personal Identity Verification-Interoperable.**
  Ensures the timeliest response possible from first responders tasked with reestablishing local water service in disaster areas by creating a standard framework for identifying these key personnel for the purposes of law enforcement. This measure would have a minimal impact on CalOES, who would be in charge of issuing these new identification cards, and would be authorized to support this new program with a fee.

CSAC appreciates the continued engagement to strengthen state and local relationships, and to realize the opportunities to safeguard fiscal resources to best support the people we collectively serve. In addition to these comments, we have sent individual letters on each bill with more detail. If you have any questions, please do not hesitate to contact me at krodriguez@counties.org. Thank you for your consideration.

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

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

Respectfully,

Kimberly Rodriguez
Chief Legislative Advocate, CSAC

CC: Honorable Monique Limón, President pro Tempore, California State Senate
Honorable Members of the Senate Appropriations Committee
Mariana Corona Sabeniano, Chief of Staff, President pro Tempore Monique Limón
Misa Lennox, Policy Director, President pro Tempore Monique Limón
Mark McKenzie, Staff Director, Senate Appropriations Committee

California State Association of Counties®
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May 4, 2026

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

RE: Support for AB 108 – Grants to hospitals in financial distress

Dear Senator Laird,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write to respectfully support AB 108 which would provide $25 million in funding through the Department of Health Care Access and Information to provide grants to hospitals in immediate and significant financial distress. Hospitals in California are struggling today.

Hospitals in California are under tremendous fiscal strain, particularly public and non-profit hospitals. In rural areas of the state, hospitals face challenges with workforce recruitment and retention as well payer mixes that rely heavily on public programs such as Medi-Cal and Medicare, which reimburse hospitals at lower rates than commercial payers.

H.R. 1 will exacerbate these challenges, by reducing enrollment in Medi-Cal. For many Californians with significant health care needs, their only option will be to seek care from hospital emergency departments. As hospitals provide care for these patients, they will face significant costs to provide uncompensated care, further challenging their ability to remain open to serve all members of the community.

For these reasons, CSAC respectfully urges the Legislature to provide $25 million in the current year to support those hospitals at the greatest risk of closure. Providing funding in the current year will provide immediate support to some hospitals in the greatest need, while the Legislature and the Administration can continue to consider how to appropriately support hospitals going forward, particularly public hospitals which will be most impacted by H.R. 1. Should you have any questions, please do not hesitate to contact me at bmccarthy@counties.org.

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Past President
Jeff Griffiths
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CEO
Graham Knaus

Sincerely,

Brendan McCarthy
Senior Legislative Advocate

CC: Honorable Members, Senate Budget & Fiscal Review
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

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1100 K Street, Suite 101 | Sacramento, CA 95814

May 8, 2026

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

RE: AB 1924 (Gabriel) Statewide homelessness prevention strategy
As Revised April 15, 2026 – SUPPORT

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 1924 by Assembly Member Jesse Gabriel. This measure would require the Department of Housing and Community Development (HCD) to develop a statewide homelessness prevention strategy.

California has made substantial progress in recent years to house and provide services to Californians experiencing homelessness. Critical state investments in programs such as Homeless Housing, Assistance, and Prevention (HHAP), Homekey, and Behavioral Health Bridge Housing have helped moved tens of thousands of Californians living without shelter into interim and permanent housing. Despite this progress, many regions continue to struggle to keep pace with the growing number of individuals and families falling into homelessness each year.

Counties are on the front lines of California's homelessness crisis and administer many of the health, social services, and housing programs that support individuals and families experiencing and at risk of experiencing homelessness. While counties remain committed to advancing local solutions, meaningful and sustained progress requires strong coordination and partnership across all levels of government.

AB 1924 recognizes the importance of a coordinated, evidence-based statewide approach to homelessness prevention. By requiring HCD to develop a statewide strategy, establish model homelessness prevention practices, and coordinate across relevant state agencies, this bill

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would strengthen alignment between state and local efforts while supporting more consistent and effective prevention strategies statewide.

This bill is also consistent with CSAC's AT HOME framework (Accountability, Transparency, Housing, Outreach, Mitigation & Economic Opportunity), which outlines clear responsibilities and accountability aligned to authority, resources, and flexibility for all levels of government within a comprehensive homelessness response system. It includes a full slate of policy recommendations to help build more housing, prevent individuals from becoming homeless, and better serve those individuals who are currently experiencing homelessness. AB 1924 aligns with the recommendations included in the Mitigation pillar of AT HOME, recognizing the importance of preventing individuals from falling into homelessness.

For these reasons, CSAC supports AB 1924. 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.

Sincerely,

Justin Garrett
Senior Legislative Advocate, CSAC

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

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

May 8, 2026

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

RE: SB 1054 (Cabaldon) Unemployment insurance: reporting requirements. As Amended March 26, 2026 – SUPPORT

Dear Senator Cervantes:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Senate Bill 1054 by Senator Christopher Cabaldon. This measure directs the Employment Development Department (EDD) to collect additional information from employers about wages to support automated eligibility determinations for health and nutrition assistance programs.

California counties administer federal safety net programs like Medicaid (Medi-Cal) and SNAP (CalFresh) on behalf of the state. The county eligibility workforce plays a critical role in ensuring eligible individuals and families obtain and retain their Medi-Cal coverage and CalFresh benefits. Recent federal legislation, H.R. 1, expands work requirements for CalFresh, adds new work requirements for Medi-Cal, and increases the frequency and complexity for Medi-Cal eligibility determinations and verifications. H.R. 1 places substantial fiscal and administrative pressures on counties and threatens the sustainability of all county programs.

SB 1054 will help mitigate some of these workload impacts on counties by improving the employment information available to support automated Medi-Cal and CalFresh work requirement exemptions and eligibility determinations. By streamlining access to reliable and enhanced employment data, the measure would reduce burdensome paperwork requirements for Californians seeking benefits while easing workload pressures on county eligibility staff. Increased automation and improved data sharing will help modernize the eligibility process, reduce administrative inefficiencies, and prevent eligible Californians from unnecessarily losing access to critical health and nutrition assistance.

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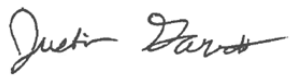
For these reasons, CSAC supports SB 1054. Should you have any questions regarding our position, please do not hesitate to contact me at (916) 698-5751 or jgarrett@counties.org. Thank you for your consideration.

Sincerely,



Justin Garrett
Senior Legislative Advocate, CSAC

CC: The Honorable Christopher Cabaldon, Member, California State Senate
Honorable Members and Consultants, Senate Appropriations Committee
Kirk Feely, Fiscal Director, Senate Republican Caucus

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

May 1, 2026

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

RE: SB 1314 (Menjivar) Smoke Shops: locations, hours of operation, and sale of nitrous oxide
As Amended April 27, 2026 – SUPPORT
Set for hearing in Senate Appropriations Committee on May 11, 2026

Dear Senator Cervantes:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of Senate Bill 1314 by Senator Menjivar. This bill would prohibit smoke shops from selling nitrous oxide or related paraphernalia. The bill would prohibit a smoke shop from being located within 600 feet of a school or daycare center.

SB 1314 would protect children and youth from nitrous oxide, which is a legal and increasingly popular substance with youth. The widespread availability of nitrous oxide may lead youth to believe that use of nitrous oxide does not have negative side effects.

In addition, the limits on the location of smoke shops in close proximity to schools and day care centers will help to reduce access to tobacco and related products to children and youth, when retailers do not scrupulously enforce age limits to purchasing such products.

SB 1314 would balance a statewide approach to these public health issues with local government control by allowing local jurisdictions to specify a radius greater than 600 feet and allowing for more restrictive local requirements on smoke shops.

For these reasons, CSAC supports SB 1314. Should you have any questions regarding our position, please do not hesitate to contact me at bmccarthy@counties.org.

Sincerely,

CSAC Officers

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Susan Ellenberg
Santa Clara County

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Monterey County

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Kent Boes
Colusa County

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Jeff Griffiths
Inyo County

CEO
Graham Knaus

Brendan McCarthy
Senior Legislative Advocate

CC: The Honorable Caroline Menjiva, Member, California State Senate
Honorable Members and Consultants, Senate Appropriations Committee
Kirk Feely, Fiscal Director, Senate Republican Caucus

May 5, 2026

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

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

The Honorable John Laird
Chair, Senate Budget and Fiscal Review Committee
1020 N Street, Room 502
Sacramento CA, 95814

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

RE: Protect Medi-Cal and Prevent Coverage Losses Against H.R. 1: Investing in County Eligibility Workforce is California's Proven, Upstream, and Cost-Effective Strategy

Dear California Budget Leaders,

The undersigned 15 organizations, reflecting a diverse set of healthcare stakeholders, respectfully request the Legislature to prioritize the necessary investment to protect Medi-Cal applicants and enrollees against H.R. 1's work and documentation requirements that threaten life-saving health care coverage from Californians with low incomes, with disproportionate impact to Latine, Black, Asian American and Pacific Islanders, and other communities.

We respectfully request the Legislature's 2026-27 Budget to invest $230.9 million General Fund (GF) in FY 2026-27, and $304.7 GF in FY 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.

California can continue its successful track record of maximizing Medi-Cal coverage by adequately funding our county eligibility workforce who are on the front lines of keeping Californians connected to Medi-Cal coverage. Investing in our eligibility workforce is one of the most upstream, cost-effective interventions the state can implement to mitigate massive Medi-Cal disenrollment, reduce costly downstream societal and fiscal impacts associated with uncompensated care, and fully maximize the existing 90% enhanced Federal Financial Participation (FFP) rate for benefits for this population and the 75% enhanced FPP rate available for these administrative activities.

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. First, the introduction of community engagement and work requirements, and second, shifting from 12-month to 6-month certification periods. For new Medi-Cal applicants, 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[1] of whom cannot be automatically renewed nor exempted and therefore will require intensive county eligibility workforce engagement and support in order to retain coverage. Among this population, DHCS projects a 50% disenrollment rate due to challenges to comply or due to 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 to properly review, identify, and certify key exemptions not discoverable through any other means than intensive review and follow-up with the client to determine who may be exempt from new requirements. Further, they support existing enrollees through compliance for individuals who do not qualify for exemptions, and help new applicants navigate the additional hurdle of demonstrating compliance one month before enrollment.

Eligibility workers must be resourced for an average of an additional 3.5 hours per client per year to review for H.R. 1's work requirement exemptions and compliance, as well as 1.2 hours per client per year for the doubled workload associated with 6 versus 12 month renewals. This investment will enable eligibility workers to support clients in navigating these complex new requirements and conducting robust reviews for exemptions. If no exemptions are found, eligibility workers will have the time to review for sufficient work and community engagement hours, and follow-up if engagement hours are not initially found or on any paperwork issues to maximize their chances of retaining coverage.

Such investment levels are consistent with historical actions to prioritize county Medi-Cal administration during past implementation of other major changes in federal healthcare policy, which made it possible for California to distinguish itself nationally as a success story in enrolling and helping retain unprecedented levels of coverage among Medi-Cal enrollees. During the ACA implementation, the state augmented annual county Medi-Cal eligibility funding by 50% or $655 million total funds (FYs 2016-17 and 2017-18), supporting historic increases in the insured rate. During the Public Health Emergency unwinding period, the state again invested in eligibility capacity, helping California secure among the highest Medicaid retention rates nationally and achieving pre-pandemic levels of coverage through the successful retention of nearly 9 million Medi-Cal recipients.

[1] Based on FY 2026-27 DHCS Governor's Budget Estimate. Subject to refinement at May Revision as additional data matches are evaluated.

We therefore urge the Legislature to prioritize adequate funding for our county Medi-Cal eligibility workforce as our most powerful, cost-effective, and proven pathway to mitigating the harms posed by H.R. 1 and protect our progress toward health coverage for all Californians.

Sincerely,

County Welfare Directors Association (CWDA)
California State Association of Counties (CSAC)
Service Employees International Union California (SEIU)
American Federation of State, County and Municipal Employees (AFSCME)
California Association of Public Hospitals (CAPH)
Cardea Health
County Health Executives Association of California (CHEAC)
Justice in Aging
Local Health Plans of California
National Health Law Program
Public Benefits Lab
Rural County Representatives of California
San Francisco Senior and Disability Action
Urban Counties of California
Western Center on Law and Poverty

cc: Members and Staff of the Senate Budget Subcommittee No. 3
Members and Staff of the Assembly Budget Subcommittee No. 1
Staff of Senate Committee on Budget & Fiscal Review
Staff of Assembly Committee on Budget
Richard Figueroa, Office of the Governor
Paula Villescaz, Office of the Governor
Joe Stephenshaw, Director, Department of Finance
Kim Johnson, Secretary, Health & Human Services Agency
Michelle Baass, Director, Department of Health Care Services
Ryan Woolsey, Legislative Analyst's Office

May 5, 2026

The Honorable Monique Límon
Senate President pro Tempore
1021 O Street ,Suite 8518
Sacramento, CA 95814

Honorable Robert Rivas
Speaker of the Assembly
P.O. Box 942849
Sacramento, CA 95814

The Honorable John Laird
Chair, Senate Budget and Fiscal Review Committee
1020 N Street, Room 502
Sacramento CA, 95814

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

RE: Protect CalFresh and Prevent Hunger Against H.R. 1: Investing in County Eligibility Workforce is California's Proven, Upstream, and Cost-Effective Strategy

Dear California Budget Leaders,

We, the 19 undersigned organizations that represent a multi-sector stakeholder coalition, urge you to prioritize protecting CalFresh benefits in the face of H.R. 1's cruel attempts to take away food assistance from Californians facing hunger. We must adequately fund our county CalFresh eligibility workforce who are on the front lines of keeping Californians connected to life-saving food benefits, and who are critical to lowering our Payment Error Rate (PER). If we do not, we risk a widespread hunger crisis, and increased risk of a $2 billion CalFresh benefit cost shift under H.R. 1.

We urge for the Legislature's budget to prioritize $102.8 million General Fund (GF) in FY 2026-27, and $57.9 million GF annually thereafter so that:

- **Counties can hire an upwards of 400 new permanent FTE eligibility workers, and**
- **Workers can spend up to an additional 2.6 to 2.9 hours per impacted client a year for robust exemption screening, verification, and engagement needed for people to retain their CalFresh benefits (*above the 79 minutes in the Governor's Budget*).**

H.R. 1 vastly expanded failed paperwork requirements and the three-month time limit on food. Beginning June 2026, at least 958,400 CalFresh recipients - nearly 1 in 5 of the entire caseload - will be forced to comply with onerous and damaging work and documentation requirements pursuant to H.R. 1 in order to continue receiving their food benefits, unless they qualify for an exemption. H.R. 1 threatens CalFresh access, including changes that directly target:

- Parents with children ages 14 or older, regardless of childcare
- Older adults up to age 65
- Veterans
- Youth aging out of foster care
- People experiencing homelessness (DSS estimates nearly 1/4 of everyone subject to the time limit are experiencing homelessness)

We applaud the California Department of Social Services (CDSS) for maximizing the use of existing data to exempt Californians from the time limit. Yet DSS estimates that at least 954,800 CalFresh recipients will be subject to the CalFresh work requirement and time limit, 69.7% of whom may be at risk of losing CalFresh. These are 665,000 Californians who already face marginalization:

- This population is disproportionately Black and Latino.
- Documented, significant barriers such as lack of transportation, identification, and re-entering from the justice system.

Experience from prior time limit implementation and national evidence shows that benefit losses are overwhelmingly driven by procedural and reporting barriers, rather than true ineligibility.

The individuals who cannot be exempted through data matching and remain subject to the time limit are those CalFresh beneficiaries that may face the greatest barriers to document compliance, including people with unstable housing, limited access to technology, irregular employment, health or behavioral health challenges, or other circumstances not easily captured through automated means and are perhaps exactly why these individuals may struggle to meet the punitive federal rules.

Retaining benefits for this population hinges on counties' ability to conduct timely, repeated, and robust exemption screening and client engagement. For example, keeping people connected to CalFresh will require eligibility workers to have in-depth conversations with people experiencing the trauma of poverty-related hunger to accurately screen for complex exemptions such as "unfit for work," and help people who are not exempt to document compliance with the work requirement on a monthly basis.

Recent federal changes prior to H.R. 1 further reshaped the policy environment by removing the bank of "percentage exemptions" that were previously available, and reduced the accrual of new percentage exemptions from 15% to 8% of the ABAWD caseload. The loss of this critical backstop

available during California's previous implementation of the time limit raises the stakes of eligibility workers having sufficient time and training.

The United States Department of Agriculture (USDA) has documented the vital role eligibility workers play in helping people navigate the CalFresh time limit while supporting accurate eligibility determinations and reducing payment errors. Workers must screen for exemptions that require nuanced and often frequent conversations, such as identifying an impairment that meets federal rules for "unfit for work," or confirming participation in a substance abuse treatment program, which can require building trust before such a disclosure is made. When someone is not eligible for an exemption, workers then must dedicate their time to support people to meet and document compliance with qualifying activities on a monthly basis. Without this level of support, the number of people who will lose CalFresh benefits will increase significantly.

We are therefore disappointed that the Governor's Budget proposes essentially no new investment in CalFresh eligibility staffing or training, particularly for the labor intensive, worker-driven screening activities that can relieve exemption-eligible CalFresh recipients from the heightened risk of discontinuance due to the application of onerous work requirements. Adequate funding for robust, quality exemption screenings is the most effective tool eligibility workers have for retaining food assistance for CalFresh recipients in the face of H.R. 1's vastly expanded work requirements and cruel three-month time limit on food.

The threats from H.R. 1 are not a foregone conclusion: the Budget can mitigate this potential hunger crisis and risk of the looming benefit cost shift, if we scale, train, and resource the county eligibility workforce to meet this moment. **We commend the Administration for its robust screening approach as directed by All County Letter 25-93, to support this population—yet the proposed funding is insufficient to implement such an approach**.

An ongoing investment will be essential so counties can have a sustainable funding source to hire the eligibility staff to do the work. These investments mitigate harm, reduce churn, and protect both clients and the State from avoidable fiscal risk. If adequately funded, staffed, and trained, the county eligibility workforce offers a clear, cost-effective, and proven pathway for the State to reduce the harms of H.R. 1 by keeping as many people as possible connected to food assistance and mitigating an emerging hunger crisis.

Evidence from other states underscores the stakes: the time limit on food has caused anywhere from 15% to 50% of affected individuals to lose food assistance. CalFresh is just $6 per person a day but is a lifeline to prevent hunger.

Helping people have enough to eat is not just a moral question, but also a fiscal one:

- Every person connected to CalFresh saves $1,400 a year in healthcare costs.
- Those subject to the CalFresh three-month time limit (as expanded on in this memo) are so vulnerable that when the time limit removes the protective factor of food assistance,

the policy is associated with elevated suicide rates compared to counties in which waivers are in place**.**

- Losing access to CalFresh will result in increased homelessness and housing instability. When individuals and families lose access to food assistance, household budgets adjust by paying for food with rent money, leading to increased evictions, shelter entries, and street homelessness.
- 30,000 grocers, farmers markets, and other authorized retailers, in local economies across California benefit from $12 billion annually in CalFresh food benefits, with each $1 in CalFresh spent generating as much as $1.80 in GDP as benefits circulate locally, and each $1 billion in benefits supporting 13,564 jobs across our food economy.
- Losing access to concrete supports like CalFresh food assistance will increase poverty-related stressors on families, increase child abuse, foster care entries and overall involvement in the Child Welfare System.

Maximizing CalFresh benefit retention is also critical given the unmatched scale of CalFresh compared to the capacity of the emergency food system: for every 1 meal provided by food banks, CalFresh delivers 9.

The choice before California is clear. Investing in our county eligibility workforce is a win-win to stand against the cruel cuts of H.R. 1 by maximizing CalFresh food assistance to prevent hunger, and support accurate benefits to reduce the risk of a benefit cost shift.

We ask you to prioritize this critical issue and look forward to working with you as the Legislature develops its Budget.

Sincerely,

County Welfare Directors Association of California (CWDA)
California State Association of Counties (CSAC)
Service Employees International Union California (SEIU)
End Poverty in California (EPIC)
End Child Poverty CA powered by GRACE
Food for People, The Food Bank for Humboldt County
Food Bank of Contra Costa and Solano
California Community Action Partnership Association
California Immigrant Policy Center (CICP)
California Work & Family Coalition
Children Now
Community Action Partnership of Orange County
Courage California
Equal Rights Advocates (ERA)
Justice in Aging
Nourish California
Public Benefits Lab
San Francisco Senior and Disability Action
Western Center on Law & Poverty

cc: Members and Staff of the Senate Budget Subcommittee No. 3
Members and Staff of the Assembly Budget Subcommittee No. 1
Staff of Senate Committee on Budget & Fiscal Review
Staff of Assembly Committee on Budget
Richard Figueroa, Office of the Governor
Paula Villescaz, Office of the Governor
Joe Stephenshaw, Director, Department of Finance
Kim Johnson, Secretary, Health & Human Services Agency
Jennifer Troia, Director, Department of Social Services
Ryan Woolsey & Ginni Bella, Legislative Analyst's Office

April 28, 2026

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

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

Dear Assemblymember Wicks:

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. Constitutions 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 does 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, which would create 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 to 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 the language, "*upon appropriation of funds from the Legislature*" 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,

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cc: The Honorable Joaquin Arambula, Member of the California State Assembly
Members of the Assembly Appropriations Committee
Jennifer Swenson, Principal Consultant, Assembly Appropriations Committee
Tobias Wolken, Consultant, Assembly Republican Caucus

RURAL COUNTY REPRESENTATIVES OF CALIFORNIA

LEAGUE OF CALIFORNIA CITIES

URBAN COUNTIES OF CALIFORNIA

April 28, 2026

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

RE: Assembly Bill 2170 – OPPOSE
As Amended April 22, 2026

Dear Assembly Member Boerner:

On behalf of the Rural County Representatives of California (RCRC), League of California Cities (Cal Cities), Urban Counties of California (UCC), and California State Association of Counties (CSAC), we 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 broad universe of industrial projects located in or within ½ mile of an "overburdened community." AB 2170 also requires translation of a large number of CEQA notices and imposes a new obligation for local agencies to have in-person interpretation 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. The April 22 amendments also significantly reduce the utility of a newly created CEQA streamlining process for housing 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 "industrial" projects 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 statutory CEQA exemptions and significantly increases project costs, complexity, and litigation risk.

AB 2170's "overburdened community" provision applies to all projects that include development, intensification, or expansion of an industrial use; however, the bill provides no definition as to what constitutes an "industrial use." Zoning varies from jurisdiction to jurisdiction and so the ambiguity as to what constitutes an "industrial uses" impairs regulatory certainty and could lead to increased litigation. Industrial uses would encompass what one traditionally considers to be industrial, like solid waste management, manufacturing, auto dismantling, fuel storage, and animal slaughter; however, it could also include a broad array of activities that are not traditionally viewed as "industrial", including aquaculture, cannabis testing and manufacturing, research laboratories, lumber yards, truck retail and sales yards, public utility yards, recycling facilities, etc.

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. The Legislature has long debated the necessary distance requirements for sensitive receptors near industrial sites in a variety of bills - a ½ a mile radius is far-reaching and will result in an extremely broad radius. 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.

AB 2170 precludes the use of statutory CEQA exemptions, which will require local agencies and developers to perform unnecessary environmental analyses for projects that already qualify for existing exemptions. The real risk associated with this requirement 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 that would now have to be prepared. This tips the scale against project developers and could be 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.

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 CEQA exemptions.

AB 2170 undermines a newly created CEQA streamlining process to expedite the construction of housing

Amendments adopted on April 22 expand the scope of AB 2170 to additionally limit the applicability of a newly created CEQA streamlining process for housing projects. Last year's SB 131 (Budget) created a streamlined CEQA review process for housing projects that would have otherwise been exempt from CEQA but for the existence of a single disqualifying condition. For those projects, the CEQA process is limited to only those impacts caused by the single condition that made the project ineligible for the exemption. Similarly, the environmental review is not required to discuss alternatives or growth inducing impacts of the project.

For example, several CEQA exemptions for housing projects cannot be used if the project is located on lands that may be habitat for protected species. If the housing project meets all the other requirements to use the exemption except that the project site may include habitat for a protected species, SB 131 allows the environmental review to focus *exclusively* on the project's

impact to habitat. The project would not have to evaluate any other environmental impacts, discuss project alternatives, or the project's growth inducing impacts. As a result, the environmental review would focus on that particular aspect of the project that would have precluded it from using the exemption.

Unfortunately, the April 22 amendments bar use of the "almost exempt" streamlining pathway for housing projects any time the project site includes habitat for protected species or contains plants subject to the Native Plant Protection Act. As a result, AB 2170 would subject those housing projects to the entire CEQA review process, including the inherent litigation risk and delays. Simply stated, AB 2170 significantly rolls back some of the most innovative CEQA streamlining processes for housing projects.

Ironically, AB 2170 undermines a CEQA streamlining process that includes more environmental disclosure, review, and mitigation than the traditional CEQA exemptions (and ministerial permit processes) that have become the new strategy for CEQA relief.

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

AB 2170 requires a broad array of CEQA notices to be translated into "threshold languages," a term which is itself ambiguously crafted and departs from long-standing definitions. Depending on the 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 its way through the 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 interpretation services 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 and interpretation 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" are not a basis for invalidating a public agency decision unless the error precluded relevant information from being presented to the public. 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. CEQA is litigious enough - local agencies should not be subject to ***any*** 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,

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cc: The Honorable Buffy Wicks, Chair, Assembly Appropriations Committee
Members of the Assembly Appropriations Committee
Nikita Koraddi, Consultant, Assembly Appropriations Committee
John Fitzpatrick, Consultant, Assembly Republican Caucus

April 27, 2026

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

RE: AB 2447 (Bauer-Kahan) – Oppose

Dear Chair Wicks:

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 2023-0081: In the Matter of Review of General Waste Discharge Requirements for Discharges from Irrigated Lands, Order No. R3-2021-0040, 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

David Najarian, President
Alameda County Farm Bureau

Alexi Rodriguez, President and CEO,
Almond Alliance of California

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

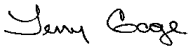
Jim Spinetta, President
Amador County Farm Bureau

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

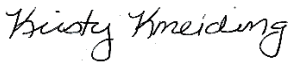
Ken Melban, Vice President of Industry Affairs and Operations
California Avocado Commission

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

Marijke Lauwerijssen, Executive Manager
Colusa County Farm Bureau

Caitie Diemel, Executive Director
East San Joaquin Water Quality Coalition

Michael Ranalli, President
El Dorado County Farm Bureau

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Grassland Drainage Area Coalition

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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

Kevin Abernathy, General Manager
Milk Producers Council

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Northern California Water Association,
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RISE (Responsible Industry for a Sound Environment)

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Eric Will, Policy Advocate
Rural County Representatives of California

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Pat Burns, President
Sonoma County Farm Bureau

Kelly Fogarty Tilma, President
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Maureen McGuire, CEO
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Noelle Cremers, Director, Environmental and Regulatory Affairs
Wine Institute

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

Renee Pinel, President/CEO
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Miranda Driver, Executive Director
Yolo County Farm Bureau

Brian Greathouse, President
Yuba-Sutter Farm Bureau

cc: The Honorable Rebecca Bauer-Kahan, California State Assembly
Members, Assembly Appropriations Committee

April 28, 2026

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

RE: AB 2635 (C. Rodriguez) Air pollution: small off-road engines: rebate programs: local regulation.
As amended on April 22, 2026 – CONCERNS

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC) and League of California Cities (Cal Cities), we write with **concerns** on Assembly Bill 2635 (C. Rodriguez) 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.

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. However, AB 2635 takes a step backward, by proposing to pause the goals set forth in AB 1346 and CARB's regulations and simultaneously preempting cities and counties from proactively passing ordinances to prohibit the use of SORE consistent with state law unless certain requirements are met. 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.

We appreciate the Author and Sponsors for their engagement; however, we continue to have the following concerns with AB 2635 as amended on April 22, 2026:

1. The bill no longer includes a sunset date of January 1, 2032, for the local ordinance prohibition. **AB 2635 should be amended to include a sunset date of January 1, 2032, for the prohibition of local ordinances, since this measure is intended to help transition to meet the state's goals.**
2. The bill requires the incentive program to be implemented by January 1, 2028; however, the prohibition of local ordinances starts January 1, 2027. **AB 2635 should be amended the start of the local ordinance prohibition matches that date: January 1, 2028, to ensure there is consistency with the development of incentive programs and ordinances.**

Therefore, we still have concerns regarding AB 2635 as amended but remain committed to continuing to work collaboratively with the Author and Sponsors. 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 (Cal Cities) at msparkskranz@calcities.org.

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

April 30, 2026

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

Re: **AB 1883 (Bryan): Workplace surveillance tools.**
As amended April 13, 2026 – OPPOSE
Assembly Committee on Appropriations – Suspense File

Dear Chair Wicks,

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), California Association of Recreation and Park Districts (CARPD), California Association of School Business Officials, 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 most 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 rapid integration 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.

Restricts security 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 *infers* information about workers engaging in activity protected by state or federal law. While amendments to Section 1581(b) are intended to provide some use of technology for security, it is not clear how agencies should interpret the language, as it would prohibit tools that incorporate AI to *make inferences* or *predictions* based on facial recognition or other tools.

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

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 *infer* or *predict* 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. More commonly, public agencies use security systems with advanced technology used to keep workers and the public safe. Examples of what constitutes facial recognition are clear, but it's less certain what could be defined as *emotional* or *gait recognition.* We are aware of advanced security cameras used in public health care settings that have identified an individual outside a hospital displaying symptoms of a stroke. The hospital was able to provide aid to the individual. We continue to have concerns about limitations on technology that can benefit the public and the workforce.

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 with rapid compliance deadlines. While we acknowledge the amendments reduce the

[2] Government Code §§ 3506 & 3506.5

statutory fine in § 1582(e), the bill would subject public agencies to civil actions, making them liable for punitive damages and attorney fees.

Heightens fiscal pressure on public agencies
Public agencies are facing considerable cost pressure from all fronts and AB 1883 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment and growing special education program demands. For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

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 respectfully **opposed** to AB 1883 and urge your “NO” vote.

Sincerely,

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Mishaal Gill
Director of Policy and Advocacy
California Association of School Business Officials
mgill@casbo.org

CC: The Honorable Isaac Bryan, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Jay Dickenson, Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Consultant, Assembly Republican Caucus

April 28, 2026

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

Re: **AB 1898 (Schultz): Workplace artificial intelligence tools.**
As amended March 20, 2026 – OPPOSE
To be heard in Assembly Committee on Appropriations

Dear Chair Wicks

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 Recreation and Park Districts (CARPD), California Association of School Business Officials (CASBO), California Association of Joint Powers Authorities (CJAPA), 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 public agencies, endanger our ability to perform essential public services, and make local governments vulnerable to waste, fraud, and abuse of public resources.

AB 1898 would impose unknown, but likely significant, costs on all public agencies, including the state's 58 counties, 483 cities, thousands of special districts, roughly 1000 school districts, and all state agencies. These costs include extensive compliance measures and frequent notification, as well as direct liability for legal fees, defense costs, and direct fines.

Public employers engage in the transparent and ethical use of workplace technologies like artificial intelligence (AI) or automated decision systems (ADS). Public agencies are required to meet and confer in good faith with public employee representatives over the terms and conditions of the workplace[1]. This longstanding law compels public agencies and unions to bargain in good faith over terms and conditions of employment, including the adoption and use of the kinds of tools defined in this and other bills that have a material effect in the workplace.

We have fundamental concerns with bills that aim to restrict how public agencies can use tools that improve service delivery or provide security for the public we serve or the public workforce.

- We oppose any legislation that would 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 most public employees have a property interest in their position that is protected by due process[2].

We understand the reasonable concerns one could have about the rapid integration 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.

Imposes significant fiscal pressures on the state, local agencies, and schools
AB 1898 would impose a variety of new fiscal and administrative pressures on all levels of government in California through direct compliance costs, indirect operational impacts, and new legal liability.

Public agencies would be required to notify employees of all AI tools that are used to assist in employment-related decisions or to surveil workers by February 1, 2027, and an annual list of workplace AI tools by February 1, 2028, and every year thereafter. Additionally, public agencies must provide notices for new tools at least 90 days

[1] Gov. Code § 3505
[2] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

before their adoption. At the risk of significant fines and civil liability, public agencies will likely find themselves forced to overreport tools in the workplace, imposing substantial administrative costs and employee labor burdens.

Compliance would require significant work and collaboration across local agency departments to conduct compliance audits before the bill takes effect, including IT professionals, legal counsel, and respective department heads and subject matter experts. Employers would be required to inventory all workplace AI tools, prepare detailed written notices for affected employees and exclusive bargaining representatives, and update internal processes to prevent inadvertent violations.

These expensive and sweeping requirements would redirect our workforces and limited budgets toward rapid compliance deadlines rather than essential public services. This unfunded mandate will unnecessarily drain public resources at a time of unprecedented budget uncertainty for government agencies and schools.

Imposes unfocused and burdensome notice requirements on public agencies
By requiring employers to provide notice regarding workplace technology tools, AB 1898 is similar to legislation that was vetoed in 2025. In the Governor's veto message of SB 7 (McNerney, 2025), the Governor stated:

> "…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."

In some ways, AB 1898 would go much further than SB 7 in mandating employer notices. First, the bill would require notice 90 days before a tool is used, three times the notice period required in SB 7. AB 1898 would also require an annual notice, whereas SB 7 did not. AB 1898 would apply more broadly to any AI, ADS, or *workplace surveillance tool* that uses artificial intelligence used in the workplace for discipline or surveillance. Finally, AB 1898 would require notices to include the specific name of a model used, general locations of tools used, and specific job roles that could be impacted – information that was not required in SB 7.

Workplace surveillance tools that use artificial intelligence
Recent amendments narrow the bill's applications from a broad definition of a "workplace surveillance tool," to a "workplace surveillance tool *that uses artificial intelligence."* Counties, schools, and other public agencies already use routine security

tools that incorporate artificial intelligence, including ID badge systems and security cameras. Work cell phones, public fleets, mobile applications, and GPS trackers already incorporate AI. These tools are not used by public agencies to undermine bargaining or intrude on the lives of public employees. They are an increasingly ubiquitous aspect of tools used to provide essential public services, to keep public facilities safe, and to make government more efficient in addressing the needs of our communities.

Burdensome and unclear notice requirements

The March 20, 2026, amendments create a confusing and onerous requirement for employee notices. Section 1601(c) mandates employers to "…require a worker to sign and confirm they received and understand…" the notice regarding use of workplace AI tools. While the amendments include deletion of language that would have provided a *clear* single worker veto of these tools, it is unclear what is intended by the remaining language. Are employers compelled to discipline employees that do not sign the notice? Is the employer allowed to use the tool without signatures from all affected workers?

Our coalition remains concerned about any pre-use notice standard. AB 1898 requires employers to provide at least 90 days of notice before introducing a workplace AI tool. If agencies are prevented from deploying a tool used for security or operations by an arbitrary deadline, they would be faced with the choice of either operating without those benefits or delaying services. Consider the opening of a new homeless shelter. Under this law, a city or county could be required to delay operations until they meet the bill's three-month notice timeframe. For workers, the frequent notices required by this bill could lead to notice fatigue.

Undermines tools used to investigate fraud and abuse

The notice required by this bill must contain, among other things, a description of the general locations and the categories of activities, communications, and job roles that will be surveilled and the technologies that 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.

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[3]. 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. In the case of another cyberattack akin to the SolarWinds breach[4], public agencies would be made even more vulnerable due to the bill's disclosure requirements. A hacker could know exactly which tools are used by a public agency with vulnerable software.

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.

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[3] https://www.justice.gov/usao-edca/pr/former-state-employee-sentenced-over-5-years-prison-2m-scheme-defraud-office-aids

[4] SolarWinds cyberattack demands significant federal and private-sector response, *Government Accountability Office* (April 2021)

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
As stated earlier, public agencies have an obligation to meet and confer with labor representatives in good faith over terms and conditions of the workplace. Those obligations are broadly defined and have been interpreted over the decades by the Public Employment Relations Board (PERB) based on the unique conditions of public workplaces. AB 1898 needlessly subjects public agencies to significant administrative burdens, legal risk, and new costs despite existing legal obligations that are consistent with the purpose of the bill.

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 with rapid compliance deadlines. While we acknowledge the amendments reduce the statutory fine in § 1602(e), the bill would subject public agencies to civil actions, making them liable for punitive damages and attorney fees.

Heightens fiscal pressure on public agencies
Public agencies are facing considerable cost pressure from all fronts and AB 1898 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment and growing special education program demands. For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million-dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

Put simply, we do not believe the costs, burden, and risks brought by this bill are necessary for public agencies. 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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CC: The Honorable Nick Schultz, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Jay Dickenson, Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Consultant, Assembly Republican Caucus

April 27, 2026

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

Re: **Assembly Bill 1961 (Ahrens). Civil actions: protective orders: workplace violence.**
As Amended April 16, 2026 – SUPPORT
To be heard in Assembly Committee on Appropriations

Dear Chair Wicks,

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. The bill should have marginal fiscal impacts, as it does not require public agencies to implement a new program or higher level of service, but rather allows agencies to respond to workplace threats.

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 from the public. In recent years, county registrars have faced bomb threats[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 all employees at the employer's workplace or a location where a group of employees perform their primary job duties. 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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[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)

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CC: The Honorable Patrick Ahrens, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Jay Dickenson, Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director, Assembly Committee on Appropriations

April 28, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended April 22, 2026)*

Dear Chair Cervantes:

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, Public Risk Innovation, Solutions, and Management, and California Association of Recreation and Park Districts, 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 notable and costly steps backwards from the enrolled version of SB 7, directly

implicating the concerns raised by the Governor. Specifically, 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 whenever an ADS output is primarily relied on to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. Increasing the burdens of compliance will deter local governments from using these important 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 as well as Proposition 98 dollars intended for students and classrooms.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For schools, this is a direct drain on Prop 98 funding. 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, and schools facing declining enrollment, 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 local 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 these 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 primarily relied on 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. Ensuring compliance with 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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CC:

The Honorable Jerry McNerney
Honorable Members, Senate Appropriations Committee
Robert Ingenito, Consultant, Senate Appropriations Committee
Heather Wood, Budget Consultant, Senate Republican Caucus

April 28, 2026

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

RE: Senate Bill 951 (Reyes) – OPPOSE UNLESS AMENDED
As Amended April 22, 2026

Dear Senator Cervantes:

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), Public Risk Innovations, Solutions, and Management (PRISM), University of California Office of the President (UCOP), California Association of Recreation and Parks Districts (CARPD) and Association of California Healthcare Districts (ACHD) we must regretfully oppose Senate Bill 951 (Reyes), regarding workforce displacement or termination due to the adoption of certain technologies, unless amended to exempt local government employers.

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 in whole or substantial part by the use of artificial intelligence (AI) or other automated technology (undefined). For employers of 100 or more employees, it would establish return rights for terminated employees and prohibit termination during the 90-day notice period. Compliance failure would cause 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 would allow 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, our organizations 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" would 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 would create liability exposure for complaints brought by any member of the public for possible violations.

For these reasons, we 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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cc: The Honorable Eloise Gomez Reyes, Member of the California State Assembly
Members of the Senate Appropriations Committee
Bob Franzoia, Consultant, Senate Appropriations Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

April 29, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
State Capitol, Room 412
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 Appropriations Committee May 4, 2026

Dear Chair Cervantes,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), and League of California Cities (CalCities) 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 all California public agencies 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.

SB 1319 could cause California's pension systems to lose an investment opportunity that typically has an expected investment return above the discount rate. That would likely cause the systems to reduce their discount rate accordingly, causing direct cost increases for the state, all local agencies and schools, and public employees. These costs could easily reach billions for public agencies.

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.

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

Enhances pressure on public agencies

Public agencies are facing considerable cost pressure from all fronts and SB 1319 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multimillion dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

Sincerely,

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CC: The Honorable Maria Elena Durazo
Members, Senate Appropriations Committee
Bob Franzoia, Consultant, Senate Appropriations Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

April 30, 2026

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

RE: Senate Bill 989 (Blakespear) – Community Assistance, Recovery and Empowerment Act (CARE) Court – REMOVE OPPOSITION

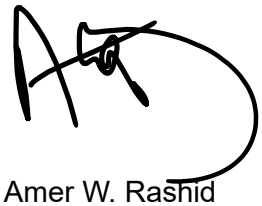
Dear Chair Cervantes,

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 are writing to remove our opposition to Senate Bill 989, as amended on April 16, 2026.** Our respective associations are appreciative that the county concerns identified in our coalition letter dated April 10, 2026, are addressed in the latest amendments and this bill now allows first responders to make referrals to county behavioral health agencies, allowing the county to decide whether an assessment is appropriate for an individual.

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. In certain counties, first responders are already making referrals to county outreach and engagement teams in which information is reviewed, and a targeted outreach to complete a clinical assessment is done. This bill now formalizes in statute that first responders can make these referrals to county behavioral health agencies and will encourage improved delivery of critical health services to populations across the state that need it most.

For the reasons above, **we are no longer opposed to SB 989, and this letter serves to formally remove our opposition to the bill.** For questions, please feel free to contact our respective organizations below.

Sincerely,



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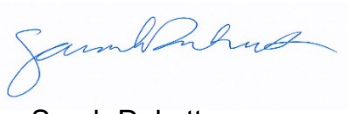

Sarah Dukett
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RCRC
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CC: Honorable Senator Catherine Blakespear
Honorable Members of the Senate Appropriations Committee
Agnes Lee, Consultant, Senate Appropriations Committee
Joe Parra, Policy Consultant, Senate Republican Caucus

April 30, 2026

The Honorable Dawn Addis
Chair, Assembly Budget Subcommittee No. 1
1021 O Street, Suite 4120
Sacramento, CA 95814

RE: Behavioral Health Services Act Revenue and Stability TBL – Oppose Unless Amended

Dear Assembly Member Addis,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write to respectfully oppose the Administration's Behavioral Health Services Act (BHSA) Revenue and Stability trailer bill proposal.

The Governor's Budget proposes trailer bill language to implement the Department of Health Care Services' Behavioral Health Services Act Revenue Stability Workgroup Report, published in May 2025. Among other things, the proposal establishes a county minimum spending requirement and modifies the limits and accessibility of county prudent reserves, however, it does not entirely align with the recommendations of the workgroup.

CSAC is opposed to the proposed trailer bill language, unless it is amended as follows:

- Maintain existing BHSA prudent reserve levels of 20% instead of dropping them to 10% to ensure greater fiscal stability across revenue changes. In addition, maintain existing BHSA prudent reserve levels for rural counties under 200,000 population at 25% instead of dropping them to 15%. This is of even greater importance as counties begin using BHSA funding for rental subsidies; a lack of sufficient reserves to offset revenue declines could result in people losing their housing.

- Provide greater flexibility for counties to access prudent reserves so that counties can account for unexpected changes in budgeted expenditures, whether through policy changes, such as the possibility of the loss of state funding for mobile crisis services, or the outcome of wildfires and other natural and other disasters at the local level.

- Allow counties to adjust funding allocations across BHSA components on a year-to-year basis, rather than every three years given the general economic uncertainty. This will allow counties to react to year-to-year changes in funding levels and demand for services at local level.

- Establish criteria, in partnership with counties, for calculating the county minimum expenditure level.

Counties – like the state – are entering a time of significant budget uncertainty due to the cost shifts created by the federal government in 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. In this fiscal environment, we are deeply concerned about proposed trailer bill language that limit counties' tools to plan for budget uncertainty just as H.R. 1 puts new county costs pressures on counties.

For these reasons, CSAC, UCC and RCRC respectfully urge the Legislature to modify the Administration's proposed trailer bill to allow counties to effectively manage BHSA revenues. Should you have any questions, please do not hesitate to contact us.

Sincerely,

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Christian Griffith, Chief Consultant, Assembly Budget Committee
Patrick Le, Consultant, Assembly Budget Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus
Eric Dietz, Principal Consultant, Assembly Republican Caucus

April 30, 2026

The Honorable Caroline Menjivar
Chair, Senate Budget & Fiscal Review Subcommittee No. 3
1021 O Street, Suite 6630
Sacramento, CA 95814

RE: Behavioral Health Services Act Revenue and Stability TBL – Oppose Unless Amended

Dear Senator Menjivar,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write to respectfully oppose the Administration's Behavioral Health Services Act (BHSA) Revenue and Stability trailer bill proposal.

The Governor's Budget proposes trailer bill language to implement the Department of Health Care Services' Behavioral Health Services Act Revenue Stability Workgroup Report, published in May 2025. Among other things, the proposal establishes a county minimum spending requirement and modifies the limits and accessibility of county prudent reserves, however, it does not entirely align with the recommendations of the workgroup.

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- Maintain existing BHSA prudent reserve levels of 20% instead of dropping them to 10% to ensure greater fiscal stability across revenue changes. In addition, maintain existing BHSA prudent reserve levels for rural counties under 200,000 population at 25% instead of dropping them to 15%. This is of even greater importance as counties begin using BHSA funding for rental subsidies; a lack of sufficient reserves to offset revenue declines could result in people losing their housing.

- Provide greater flexibility for counties to access prudent reserves so that counties can account for unexpected changes in budgeted expenditures, whether through policy changes, such as the possibility of the loss of state funding for mobile crisis services, or the outcome of wildfires and other natural and other disasters at the local level.

- Allow counties to adjust funding allocations across BHSA components on a year-to-year basis, rather than every three years given the general economic uncertainty. This will allow counties to react to year-to-year changes in funding levels and demand for services at local level.

- Establish criteria, in partnership with counties, for calculating the county minimum expenditure level.

Counties – like the state – are entering a time of significant budget uncertainty due to the cost shifts created by the federal government in 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. In this fiscal environment, we are deeply concerned about proposed trailer bill language that limit counties' tools to plan for budget uncertainty just as H.R. 1 puts new county costs pressures on counties.

For these reasons, CSAC, UCC and RCRC respectfully urge the Legislature to modify the Administration's proposed trailer bill to allow counties to effectively manage BHSA revenues. Should you have any questions, please do not hesitate to contact us.

Sincerely,

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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

California Alliance
Empowering lives. Enriching futures.
Californians for Safety and Justice
MHA Mental Health America of California
cbhda
COUNTY BEHAVIORAL HEALTH DIRECTORS ASSOCIATION
CALIFORNIA
CAMFT
California Youth Empowerment Network
CAYEN
Sycamores
a better life
Disability Rights California
CSAP
CALIFORNIA STATE ASSOCIATION OF PSYCHIATRISTS
NAMI California
National Alliance on Mental Illness
STEINBERG INSTITUTE
Children Now
CALIFORNIA ACADEMY of CHILD & ADOLESCENT PSYCHIATRY
CAL VOICES
ADVOCACY • RECOVERY • PEER SUPPORT
DRUG POLICY ALLIANCE
CCBH
California Coalition for Behavioral Health
LIVE
CBHA
CALIFORNIA BEHAVIORAL HEALTH ASSOCIATION
Camhpro
CALIFORNIA OPIOID MAINTENANCE PROVIDERS
NATIONAL HEALTH LAW PROGRAM
Pacific Clinics
TARZANA TREATMENT CENTERS
Integrated Healthcare
seneca
unconditional care
CALIFORNIA PSYCHOLOGICAL ASSOCIATION
CALIFORNIA STATE ASSOCIATION OF PA|PG|PC
CAADPE
CALIFORNIA ASSOCIATION OF ALCOHOL AND DRUG PROGRAM EXECUTIVES
RCS
Redwood Community Services, Inc.
CALIFORNIA PUBLIC DEFENDERS ASSOCIATION
National Center for Youth Law
California Hospital Association
California Behavioral Health Planning Council
ADVOCACY • EVALUATION • INCLUSION
CALIFORNIA LGBTQ HEALTH AND HUMAN SERVICES NETWORK
California Association of Local Behavioral Health Boards and Commissions
EMERGENCY MEDICAL SERVICES ADMINISTRATORS' ASSOCIATION OF CALIFORNIA
EMSAAC
ACLU CALIFORNIA ACTION
JUDGE DAVID L. BAZELON CENTER FOR MENTAL HEALTH LAW
911 AMBULANCE PROVIDER'S ALLIANCE
AMR
Global Medical Response
CSH
edgewood
Hillsides
CREATING LASTING CHANGE
ACHSA
SHERIFF SACRAMENTO COUNTY
CRISIS SUPPORT SERVICES of Alameda County
DIDI HIRSCH
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calpcc
California Association for Licensed Professional Clinical Counselors

April 27, 2026

Honorable Jesse Gabriel (Chair)
Assembly Committee on Budget
1021 O Street, Suite 8230
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Honorable John Laird (Chair)
Senate Budget and Fiscal Review Committee
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Honorable Dawn Addis (Chair)
Assembly Budget Subcommittee #1 – Health
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Honorable Caroline Menjivar (Chair)
Senate Budget Subcommittee #3 – Health and Human Services
1021 O Street, Suite 6630
Sacramento, CA 95814

Subject: Opposition to 2026-27 Governor's January Budget Proposal to Eliminate the Statewide Medi-Cal Mobile Crisis Benefit

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Dear Senators Laird and Menjivar, and Assemblymembers Gabriel and Addis

The undersigned organizations share a common mission of improving the behavioral health of Californians. As such, we write to express our strong opposition to the proposed elimination of the statewide Medi-Cal Community-Based Mobile Crisis Intervention Services benefit (referred to as the Mobile Crisis Benefit).The proposal to shift this benefit from a statewide mandatory Medi-Cal benefit to an optional, county-funded, benefit poses significant risks to maintaining California's progress in ensuring all Californians have access to a comprehensive behavioral health crisis response system.

Since its implementation, the Medi-Cal Mobile Crisis benefit has provided timely, coordinated, and clinically appropriate behavioral health crisis support throughout the state. While this benefit was established to serve the Medi-Cal population, mobile crisis teams are structured to respond regardless of insurance status. In practice, these teams serve not only individuals enrolled in the Medi-Cal program, but also those served through commercial insurance or those who lack insurance. Mobile crisis teams have successfully diverted individuals experiencing behavioral health crises from emergency departments and reduced law enforcement involvement. Mobile crisis teams have also contributed to a significant reduction in Lanterman-Petris-Short (LPS) 5150 involuntary psychiatric holds, which can be traumatic and have lasting negative impacts on individuals and their families and have connected individuals to ongoing behavioral health services. Mobile crisis teams are also essential to local responses to address homelessness, substance use conditions, as well as the youth mental health crisis. Notably, 44% of adults who utilized a mobile crisis team were connected to mental health services within 30 days of these services.[1]

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[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

Making this an optional benefit could result in increased county costs of $169 million annually to cover the non-federal share of costs, based on current utilization of the benefit. In addition, the implementation of the Behavioral Health Services Act (BHSA), which restructures county funding by shifting resources from mental health services to housing, combined with the impacts of House Resolution 1 (H.R. 1), will further strain county resources. Under the Governor's Budget proposal, counties would be forced to make difficult decisions within existing fiscal constraints, potentially reducing the scope of mobile crisis services or eliminating this benefit entirely, leaving too many vulnerable individuals without access to essential community-based crisis response.

Over the course of the last few years, both State and County have made substantial investments to build out the infrastructure, workforce capacity, and systems coordination necessary to deliver this benefit effectively and meet its stringent federal and state requirements. Scaling back coverage of this benefit would risk undermining these investments and lead to gaps in access to crisis services and lead to negative outcomes for individuals with behavioral health crisis needs.

Furthermore, under the federal Medicaid's Early and Periodic Screening Diagnostic and Treatment (EPSDT) mandate, counties will still need to provide mobile crisis response to children and youth on Medicaid under the age of 21. A system in which children's mobile crisis services are mandatory while adult mobile crisis services are optional creates more confusion and harm for vulnerable individuals, providers, and counties.

For these reasons, we respectfully urge the Legislature to reject the January budget proposal to change the Medi-Cal Mobile Crisis benefit into an optional county benefit, and to maintain and extend the benefit as a statewide, mandatory Medi-Cal benefit. Doing so would ensure equitable access to behavioral health crisis services throughout the state and preserve the significant number of investments already made in the behavioral health crisis continuum.

Sincerely,

Adrienne Shilton
Senior Vice President of Public Policy & Strategy
California Alliance of Child and Family Services

Michelle Cabrera
Executive Director
County Behavioral Health Directors Association

And the undersigned organizations:

John Surface
President
911 Ambulance Provider Alliance

Narges Zohoury Dillon
President
988 California: Crisis Center Consortium

Alicia Benavidez
Director of Legislative Affairs

Jodi Kurata
Chief Executive Officer

ACLU California Action

Thomas Wagner
President, National Operations
American Medical Response

Lizzie Guansona
Legislative Advocate
California Academy of Child & Adolescent Psychiatry

Suzzette Garcia
Chief Executive Officer
California Association of Licensed Professional Clinical Counselors

Joy Alafia
Executive Director
California Association of Marriage and Family Therapists

Dr. Le Ondra Clark Harvey
Chief Executive Officer
California Behavioral Health Association

Theresa Comstock
President
California Coalition for Behavioral Health

Dannie Ceseña
Network Director
California LGBTQ Health and Human Services Network

Jennifer Alley
Executive Director
California Opioid Maintenance Providers

Tyler Rinde
Director of Government Affairs
California Psychological Association

Paul Yoder
Managing Director and Legislative Advocate
Association of Community Human Service Agencies

Jennifer Mathis
Deputy Director
Bazelon Center for Mental Health Law

Robert Layne
Executive Director
California Association of Alcohol and Drug Program Executives

Bill Stewart
President
California Association of Local Behavioral Health Boards and Commissions

Lynn Rivas
Executive Director (Interim)
California Association of Mental Health Peer Run Organizations

Tony Vartan
Chairperson
California Behavioral Health Planning Council

Kirsten Barlow
Vice President, Policy
California Hospital Association

Brendan McCarthy
Senior Legislative Advocate
California State Association of Counties

Kate Chatfield
Executive Director
California Public Defenders Association

Anthony DiMartino
Government Affairs Director
Californians for Safety and Justice

Tom Scott
Executive Director
California State Association of Public

California State Association of Psychiatrists

Meron Agonafer
Policy Director
Cal Voices

Shawna Morris
Chief Executive Officer
Casa Pacifica Centers for Children & Families

Jacob Rosan
Managing Mental Health Clinician
Crisis Alternative Response of Eureka
City of Eureka

Narges Zohoury Dillon
Executive Director
Crisis Support Services of Alameda County

Monica Porter Gilbert
Associate Director and Senior Counsel of Public Policy
Disability Rights California

Lynn Dolce
Chief Executive Officer
Edgewood

Jeremey Shumaker
Associate Vice President, Pacific Region
Global Medical Response

Caroline Grinder
Legislative Advocate
League of California Cities

Karen Vicari
Director of Public Policy
Mental Health America of California

Dana Paycao
Senior Policy Coordinator - Health
National Council of Youth Leadership

Administrators, Public Guardians and Public Conservators

Danny Thirakul
Public Policy Coordinator
California Youth Empowerment Network

Lishaun Francis
Senior Director, Behavioral Health
Children Now

Sharon Rapport
Director, California State Policy
Corporation for Supportive Housing

Marika Collins
Director of Public Policy & Advocacy
Didi Hirsch Mental Health Services

Grey Gardner
California State Director
Drug Policy Alliance

Shaun Vincent
President
Emergency Medical Services Administrators' Association of California

Giselle Barragan
Grants & Policy Analyst
Hillsides

Anthony Garibay-Mena
Project Manager
LGBTQ+ Inclusivity, Visibility, and Empowerment (LIVE)

Jessica Wilson (Cruz)
Chief Executive Officer
NAMI-California

Kimberly Lewis
Managing Director, California Advocacy and Practice Area
National Health Law Program

Eva Terrazas
Chief Public Policy and Advocacy Officer
Pacific Clinics

Jim Cooper
Sheriff
Sacramento County Sheriff's Office

Tara Gamboa-Eastman
Director of Government Affairs
Steinberg Institute

Albert M. Senella
President/ Chief Executive Officer
Tarzana Treatment Centers

Victoria Kelly
Chief Executive Officer
Redwood Community Services

Leticia Galyean
Chief Executive Officer
Seneca

Jana Lord
Chief Operating Officer
Sycamores

CC:

Honorable Roger Niello, Vice Chair Senate Budget Committee
Scott Ogus, Senate Budget Subcommittee #3
Patrick Le, Assembly Budget Subcommittee #1
Anthony Archie, Senate Budget Republican Caucus
Eric Dietz, Assembly Republican Caucus
Richard Figueroa, Deputy Cabinet Secretary, Governor's Office
Joe Stephenshaw, Director, Department of Finance
Erika Li, Chief Deputy Director, Budgets, Department of Finance
Guadalupe Manriquez, Program Budget Manager, Health, Department of Finance
Kim Johnson, Secretary, California Health and Human Services Agency
Corrin Buchanan, Undersecretary, California Health and Human Services Agency
Stephanie Welch, Deputy Secretary of Behavioral Health, California Health and Human Services Agency
Brent Houser, Assistant Secretary, California Health and Human Services Agency
Michelle Baass, Director, Department of Health Care Services
Tyler Sadwith, Medicaid Director, Department of Health Care Services
Paula Wilhelm, Deputy Director, Behavioral Health, Department of Health Care Services

April 29, 2026

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

Re: AB 1859 (Ortega): Public Works.
NOTICE OF OPPOSE UNLESS AMENDED *(As introduced 2/11/2026)*

Dear Chair Wicks,

On behalf of the League of California Cities (Cal Cities), California State Association of Counties (CSAC), Rural County Representatives of California (RCRC), California Special Districts Association(CSDA), and Community College Facility Coalition, we regrettably must oppose unless amended **Assembly Bill 1859 (Ortega)** which creates a new mandate on local agencies to allow representatives of a joint labor-management committee (JLMC) to access active public works job sites for the purpose of ensuring compliance with existing prevailing wage and apprenticeship requirements.

Our opposition to AB 1859 is grounded in the bill's structure, which would grant any third-party JLMCs a statutory right of access to public works job sites, coupled with a private right of action, civil penalties, and attorney's fees against public agencies for alleged denial of access. This framework raises significant operational, legal, and fiscal concerns for public entities serving as awarding bodies.

First, AB 1859 creates a new and ambiguous access mandate that public entities would be responsible for administering and enforcing on active public works job sites. We appreciate that "reasonable access" includes compliance with safety guidelines and personal protective equipment. We also want to recognize that the JLMC will carry responsibility for any insurance or workers composition claims, however this does not fully assuage our safety concerns. This definition of "reasonable access" does not contemplate public works projects that occur on private lands or are only accessible

through private property, which our members have reported being problematic. They are especially concerned about granting access to lands they do not control and how this bill will impact fire mitigation and flood prevention work that is often done on private lands. In addition, "reasonable access" does not contemplate that counties operate high-security facilities such as jails, juvenile facilities, hospitals, locked behavioral health facilities, treasuries, and facilities where minors may be present, where security protocols are necessary. Allowing unvetted individuals onto these construction sites, which would have access to information on the layout of secure facilities or where individuals within the county's custody are present, could jeopardize the safety and security of these sites. While schools may be excluded from the bill, there are numerous programs through parks and community centers for minors that also require fingerprinting and additional security protocols.

Public works sites are dynamic environments governed by strict Cal/OSHA requirements, contractor safety plans, and, in many cases, project labor agreements that already regulate site entry and oversight. Requiring public entities to accommodate third-party access risks interfering with contractor-controlled operations and could disrupt project timelines, increase safety risks, and create confusion over who has ultimate authority at the site, regardless of whether or not it is reasonable Public owners often turn oversight of the project and job site over to the contractor, both legally and functionally, yet under AB 1859 the owners would be subject to civil penalties for failure to provide "reasonable access" to JLMC members – something the owner would likely not be actively managing on a day-to-day basis.

Another significant concern is that the bill requires granting "reasonable access" to any JLMC to job sites, rather than those who have members on our sites. By allowing any JLMC access this puts public entities and contractors in the middle of multiple unions on our sites. This is a dispute we have no interest in, nor do we feel this is appropriate. Additionally, there is no guarantee these JLMC members would have any expertise in construction or any qualifications to be on an active job site.

Moreover, public entities would be placed in the untenable position of mediating disputes between contractors and third-party entities regarding access rights, without clear statutory guidance. Even with language intended to limit liability, public entities remain exposed to disagreements over what constitutes "reasonable" versus "denied" access, creating ongoing administrative burdens for project managers, inspectors, and legal staff.

AB 1859 references joint labor-management committees authorized under federal law (LMRA §302(c)(9)), which are intended to promote labor-management cooperation and training. However, federal law does not grant these committees job site access rights, nor does it confer independent enforcement authority over prevailing wage compliance. By contrast, California already vests enforcement authority in the

Department of Industrial Relations (DIR), which administers a comprehensive and centralized system for prevailing wage monitoring and compliance.

AB 1859 would effectively deputize external entities with statutory access rights and legal standing to monitor compliance, creating a duplicative and potentially conflicting oversight structure. These risks undermine the uniformity of enforcement, introducing inconsistent interpretations of labor standards, and complicating compliance efforts for public entities and contractors alike. The bill does not clearly delineate how these third-party activities would be coordinated with DIR enforcement, raising the potential for overlapping investigations, conflicting directives, and increased project delays.

The bill significantly expands litigation risk for public entities by authorizing JLMCs, entities that are not parties to the construction contract, to bring legal action against awarding bodies for alleged denial of access. The inclusion of mandatory civil penalties and attorney's fees for prevailing plaintiffs creates a strong incentive for litigation, regardless of the underlying merits of a claim. Public entities could face frequent legal challenges stemming from routine job site access disputes, including those arising from safety-related restrictions or contractor-controlled entry protocols.

The six-month statute of limitations, combined with per-incident penalties, further compounds this risk by enabling multiple claims across a single project or portfolio of projects. Even minor or inadvertent misunderstandings could expose public entities to cumulative financial liability, diverting limited public resources away from critical infrastructure and community services. Smaller public agencies may lack the staffing and legal capacity to manage this increased exposure.

Beyond the immediate legal and operational concerns, AB 1859 risks increasing the overall cost and complexity of delivering public works projects. Public entities may need to revise contract documents, develop new compliance protocols, and dedicate additional staff time to manage access requests and potential disputes. Contractors, facing uncertainty around site control and increased third-party presence, may incorporate higher risk premiums into bids, ultimately raising project costs for taxpayers and reducing the extent and quality of infrastructure that can be completed with limited public dollars. Fewer road safety improvements, water system extensions, and critical upgrades to emergency and public safety facilities will occur as a result of AB 1859.

Additionally, the bill could have a chilling effect on project delivery timelines. The potential for access-related disputes and litigation introduces uncertainty that may delay construction schedules, complicate coordination among project stakeholders, and hinder the timely completion of critical public infrastructure projects.

For these reasons, Cal Cities, CSAC, RCRC, CSDA, Community College Faculty Association have significant concerns with AB 1859 and respectfully oppose the measure unless it is substantially amended to address the reasonable access concerns, duplicative enforcement structure, and heightened legal and fiscal risks it would impose on public entities, as outlined above. Should you have any questions or concerns regarding our position, please do not hesitate to contact Damon Conklin (Cal Cities) at dconklin@calcities.org, Mark Neuburger (CSAC) at mneuburger@counties.org, Sarah Dukett (RCRC) at sdukett@rcrcnet.org , Brittney Barsotti Brittneyb@csda.net (CSDA), Rebecca Kalleen with the Community College Facility Coalition at rkalleen@m-w-h.com or Ethan Nagler with the California Association of Recreation and Park Districts at enagler@publicpolicygroup.com

Damon Conklin
Legislative Advocate
League of California Cities

Mark Neuburger
Legislative Advocate
California State Association of Counties

Legislative Representative
California Special Districts Association

Senior Policy Advocate
Rural County Representatives of California

Rebekah Kalleen
Executive Director
Community College Facility Coalition

Ethan Nagler
Legislative Representative
California Association of Recreation and Park Districts

Cc: The Honorable Members of the Assembly Committee on Appropriations
The Honorable Liz Ortega, Assembly Member, 20th District
Jay M. Dickenson, Chief Consultant, Assembly Committee on Appropriations
Tobias Wolken, Consultant, Assembly Republican Caucus

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

April 28, 2026

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

RE: AB 2320 (Ta) Multifamily Housing Program: Homekey: adaptive reuse.
As amended April 27, 2026

Dear Assemblymember Wicks,

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.

Our members have directly experienced these constraints. For example, jurisdictions working to advance adaptive reuse projects have identified feasible sites that could not

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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 Appropriations

April 14, 2026

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

RE: **AB 2373 (Dixon) Neighborhood-Scale Adaptation Approach for Coastal Planning.**
Notice of SUPPORT *(As Introduced on February 19, 2026)*

Dear Chair Bryan,

On behalf of the undersigned organizations, we write to express our support for AB 2373, which would provide coastal communities with additional flexibility by authorizing the use of a neighborhood-scale adaptation approach when updating Local Coastal Programs (LCPs). This approach would support more effective LCP updates and implementable coastal adaptation planning in response to sea level rise, coastal flooding, and erosion affecting California's coastline.

Under the Coastal Act, LCPs are foundational planning tools that balance coastal resource protection with community development and public access. However, updating LCPs can be complex and resource intensive. Coastal jurisdictions are already required to address evolving climate science, infrastructure and development vulnerabilities, public access requirements, and other standards to ensure consistency with the Coastal Act and obtain certification from the Coastal Commission. Going through this process then allows local governments to retain their land use permitting authority in the coastal zone. Addressing these challenges are intensified by accelerating sea level rise and storm surge events, which demand both immediate and long-term adaptation strategies.

AB 2373 would provide a framework to help local governments in updating their LCPs. The bill would clarify that local governments may use a neighborhood-scale adaptation approach when developing land use policies and implementation measures within their LCPs. The bill would allow coastal jurisdictions to identify specific areas or coastal assets with shared characteristics and to tailor adaptation strategies based on localized geophysical conditions and land use patterns. By supporting cities and counties with

their LCP updates on a more manageable scale, the bill would improve local coastal planning and provide greater certainty for LCP approvals, while maintain consistency with the Coastal Act.

For these reasons, the undersigned organizations respectfully support AB 2373 (Dixon). 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

Jordan Wells
Legislative Advocate
California State Association of Counties

Molly Haviland
City Manager
City of Point Arena

Ed Waage
Mayor
City of Pismo Beach

Esther C. Sanchez
Mayor
City of Oceanside

Mark Enmeier
Councilmember
City of San Clemente

cc: The Honorable Diane Dixon
Members, Assembly Natural Resources Committee

April 22, 2026

The Honorable Buffy Wicks
Chair, Assembly Committee on Appropriations
1021 O Street, Suite 8220
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 16, 2026 – SUPPORT

Dear Chair Wicks,

On behalf of the California State Association of Counties (CSAC) and League of California Cities (Cal Cities), 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 (Cal Cities) at msparkskranz@calcities.org

Respectfully,

Jordan Wells
Legislative Advocate
California State Association of Counties

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

cc: The Honorable Cottie Petrie-Norris, Member of the California State Assembly
Members, Assembly Appropriations Committee

April 21, 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 Amended on 4/16/2026)*

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 (Bauer-Kahan)**, which would require the Department of Insurance to review and update the distressed areas as defined under the Catastrophe Modeling 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 require CDI to specifically consider the number of residential properties in the ZIP Code that are insured by the FAIR Plan, and the number of residential properties in the ZIP Code that are insured in the voluntary market by admitted insurers under a policy of qualifying residential property insurance. By reviewing the distressed areas definition this could allow more jurisdictions to have access to insurance under the Catastrophe Modeling regulations.

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 23, 2026

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

RE: SB 955 (Blakespear) Beverage containers: supermarkets: reverse vending machines.
As amended on April 9, 2026 – SUPPORT

Dear Chair Cervantes,

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, we write in **support** of Senate Bill 955 (Blakespear) related to beverage container recycling.

California enacted the Beverage Container Recycling and Litter Reduction Act in 1986, establishing a deposit-refund system requiring consumers to pay a California Redemption Value (CRV) on eligible beverage containers and receive that deposit back upon recycling. The program is intended to reduce litter, increase recycling, and conserve resources by achieving an 80% recycling rate for all CRV containers. However, despite achieving a statewide recycling rate of approximately 70% in 2024, many consumers face limited access to convenient redemption opportunities, undermining the program's effectiveness and, in practice, preventing many consumers from reasonably redeeming the deposits they pay.

Over time, the Legislature has modernized the Act in response to identified implementation challenges, gaps in covered beverage container types, and advances in recycling systems, including expanding the program to include wine, distilled spirits, and certain juice containers; establishing "convenience zones" to improve consumer access; and incorporating reverse vending machines (RVMs) to streamline redemption. However, the definition of "supermarket," last updated in the 1980s, excludes certain beverage retailers that warrant inclusion under the current program framework.

SB 955 refines the statutory definition of "supermarket" by increasing the gross annual sales threshold to $5 million and by eliminating the requirement related to whether the

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retail store operates a bakery or deli. For these reasons, we are pleased to **support** SB 955. 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 Catherine Blakespear, Member of the California State Senate
Members, Senate Appropriations Committee

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

April 20, 2026

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

RE: SB 997 (Caballero) North Fork Kings Groundwater Sustainability Agency: lien authority.
As introduced on February 9, 2026 –Notice of SUPPORT
To be heard in the Senate Judiciary Committee on April 28, 2026

Dear Chair Umberg,

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

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necessary authorities to ensure that groundwater supplies are managed wisely for the benefit of agriculture, 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

April 16, 2026

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

Support for SB 1085 (Durazo) – Water Supply Planning Act

Dear Senator Durazo,

We, the undersigned, are proud to support your SB 1085, the Water Supply Planning Act.

SB 1085 restores an important safeguard on water availability for new large developments that was inadvertently circumvented through recent legislation.

For more than three decades, state law has required water supply assessments (WSAs) for certain large development projects in recognition of the important link between land use planning and water supply planning. A WSA is an informational tool that focuses on identifying the long-term water supply needed to serve large development projects. California law requires

a city or county, upon determining that a project is subject to CEQA, to request a WSA if a project meets certain requirements, including that the project is more than 500 residential units or a non-residential project that demands a similar or greater amount of water. A WSA also allows for early coordination between a water supplier, a land use entity, and a developer. This relationship and information exchange, at the beginning stages of a project, helps ensure efficient project implementation throughout the process.

Recent laws that have eliminated CEQA analysis have inadvertently meant that WSAs are no longer triggered in certain circumstances, even though the project still meets the WSA criteria under state law. SB 1085 restores this important tool for ensuring that new large developments have a long-term water supply, which is critical in light of the impacts that climate change and future droughts could have on areas throughout the state.

Thank you for your leadership on this important statewide issue.

Sincerely,

Kylie Wright
Policy Advocate
Association of California Water Agencies

Matt Clifford
California Director
California Trout Unlimited

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Jennifer Capitolo
Executive Director
California Water Association

Shannon Olivieri Hovis
Chief Strategy Officer
California Environmental Voters

Council Member Caity Maple
Chair, Law & Legislation Committee
City of Sacramento

Alexandra Biering
Policy Director
California Farm Bureau

Suzanne Hume
Educational Director & Founder
CleanEarth4Kids.org

Andrea Abergel
Director of Water
California Municipal Utilities Association

Jennifer Clary
California Director
Clean Water Action

Anthony Tannehill
Legislative Representative
California Special Districts Association

Catherine Van Dyke
Director of Water Policy
Community Alliance with Family Farmers

Charles Delgado
Legislative Advocate
California State Association of Counties

Kelsey Hinton
Policy Director
Community Water Center

Ernesto A. Avila
Board President
Contra Costa Water District

Ashley Overhouse
Water Policy Advisor
Defenders of Wildlife

Kathy Viatella
Manager of Legislative Affairs
East Bay Municipal Utility District

Jann Dorman
Executive Director
Friends of the River

Paul Cook, P.E.
General Manager
Irvine Ranch Water District

Dave Pedersen
General Manager
Las Virgenes Municipal Water District

Nataly Escobedo Garcia, Ph.D.
Policy Manager, Water/Climate Programs
Leadership Counsel for Justice and Accountability

Dennis O'Connor
Legislative Coordinator
Mono Lake Committee

Kimberly A. Thorner
General Manager
Olivenhain Municipal Water District

Johnnie Carlson
Associate Director
Planning and Conservation League

James Peifer
Executive Director
Regional Water Authority

Ben Eichenberg
Senior Staff Attorney
San Francisco Baykeeper

Ann Hayden & Sarah Woolfe
Co-Chairs
SJVWCAP

Molly Culton
Chapter Organizing Director
Sierra Club CA

Joshua Golka
Head of State Government Relations
Valley Water

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

Elizabeth Dougherty, Ph.D.
Executive Director
Wholly H2O

April 16, 2026

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

Support for SB 1085 (Durazo) – Water Supply Planning Act

Dear Senator Durazo,

We, the undersigned, are proud to support your SB 1085, the Water Supply Planning Act.

SB 1085 restores an important safeguard on water availability for new large developments that was inadvertently circumvented through recent legislation.

For more than three decades, state law has required water supply assessments (WSAs) for certain large development projects in recognition of the important link between land use planning and water supply planning. A WSA is an informational tool that focuses on identifying the long-term water supply needed to serve large development projects. California law requires

a city or county, upon determining that a project is subject to CEQA, to request a WSA if a project meets certain requirements, including that the project is more than 500 residential units or a non-residential project that demands a similar or greater amount of water. A WSA also allows for early coordination between a water supplier, a land use entity, and a developer. This relationship and information exchange, at the beginning stages of a project, helps ensure efficient project implementation throughout the process.

Recent laws that have eliminated CEQA analysis have inadvertently meant that WSAs are no longer triggered in certain circumstances, even though the project still meets the WSA criteria under state law. SB 1085 restores this important tool for ensuring that new large developments have a long-term water supply, which is critical in light of the impacts that climate change and future droughts could have on areas throughout the state.

Thank you for your leadership on this important statewide issue.

Sincerely,

Kylie Wright
Policy Advocate
Association of California Water Agencies

Matt Clifford
California Director
California Trout Unlimited

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Jennifer Capitolo
Executive Director
California Water Association

Shannon Olivieri Hovis
Chief Strategy Officer
California Environmental Voters

Council Member Caity Maple
Chair, Law & Legislation Committee
City of Sacramento

Alexandra Biering
Policy Director
California Farm Bureau

Suzanne Hume
Educational Director & Founder
CleanEarth4Kids.org

Andrea Abergel
Director of Water
California Municipal Utilities Association

Jennifer Clary
California Director
Clean Water Action

Anthony Tannehill
Legislative Representative
California Special Districts Association

Catherine Van Dyke
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Joshua Golka
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Valley Water

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

Elizabeth Dougherty, Ph.D.
Executive Director
Wholly H2O

April 17, 2026

The Honorable Aisha Wahab
Member, California State Senate
1021 O Street, Suite 8530
Sacramento, CA 95814

RE: **SB 1326 (Wahab) California Environmental Quality Act: tribal cultural resources: mitigation measures.**
Notice of OPPOSE UNLESS AMENDED *(As Introduced on February 20, 2026)*

Dear Senator Wahab,

The League of California Cities (Cal Cities), the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Association of California Water Agencies (ACWA) respectfully submit our **Oppose Unless Amended** position on **SB 1326 (Wahab)**, which would expand requirements under the California Environmental Quality Act (CEQA) related to tribal cultural resources and mitigation measures.

Under existing law, CEQA requires lead agencies to consult with tribal governments who are traditionally and culturally affiliated with project areas to evaluate potential impacts and to identify measures to avoid or mitigate impacts to tribal cultural resources, where feasible.

SB 1326 would impose significant changes in how tribal cultural resources are identified and how a lead agency under CEQA mitigates potential impacts to tribal cultural resources, for which we have deep understanding and respect for. We support CEQA's core objectives of public disclosure, informing the decision-making process, and mitigating a project's significant impacts on the environment. As such, we are committed to continuing to work with the author on the bill.

SB 1326 would expand the definition of a tribal cultural resource to include sanctified cemetery, cemetery, or burial area or an object of cultural value to a California Native American tribe. The bill would include a tribal cultural resource site to be included in a local register or identified by the Native American Heritage Commission (NAHC). As is current practice, the NAHC does not include specific locations of sacred sites in public records to provide confidentiality and protections to these sites and instead maintains a "Sacred Lands Files" that during the CEQA process, the NAHC provides developers and lead agencies with a list of affiliated Native American tribes for consultation to discuss the potential for a project to impact those sites.

We are concerned about the transparency and procedures for identifying and automatic inclusion of sites in a local tribal register as those decisions may have

profound impacts on private landowners and are broadly crafted to include a large universe of groups irrespective of federal recognition.

SB 1326 would require a lead agency to adopt mitigation measures to avoid or minimize the significant adverse impacts, including avoidance and preservation of a resource in place. Additionally, the bill would require mitigation measures to include reburying or relocating a resource on a project property in a location that would be protected from further disturbance or harm in perpetuity. It may be unreasonable for dense urban areas or where projects cannot allow for preservation for this approach to be required. Further, it is infeasible for a lead agency to have certainty that a relocated resource will be protected forever. These changes would create additional opportunities for legal challenges to projects. CEQA is already one of the most litigated environmental statutes in the country, and these new requirements could lead to further litigation exposure and delay necessary projects, including housing, transportation, and infrastructure projects. While we support some of the provisions included in SB 1326, we have significant concerns about others.

SB 1326 raises the important question of how to improve the CEQA consultation process. We are committed to continuing to work with the author on amendments regarding consultation and the protection of tribal cultural resources under CEQA but in a way that can be feasibly implemented by local governments that would neither impede projects nor create increased litigation exposure.

For these reasons, Cal Cities, RCRC, CSAC, and ACWA remain respectfully **Oppose Unless Amended** on SB 1326 (Wahab). For questions, please contact Melissa Sparks-Kranz (Cal Cities) at msparkskranz@calcities.org, John Kennedy (RCRC) at jkennedy@rcrcnet.org, Charles Delgado (CSAC) at cdelgado@counties.org or Amber Rossow (ACWA) at amberr@acwa.com.

Sincerely,

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

John Kennedy
Senior Policy Advocate
Rural County Representatives of California

Charles Delgado
Legislative Advocate
California State Association of Counties

Amber Rossow
State Relations Advocate
Association of California Water Agencies

cc: Members, Senate Environmental Quality Committee

April 21, 2026

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

RE: Senate Bill 1404 (Stern) — OPPOSE
As Amended April 20, 2026

Dear Senator McNerney,

On behalf of the Rural County Representatives of California (RCRC) and the California State Association of Counties (CSAC), we regretfully oppose Senate Bill 1404 (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 who 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 must oppose SB 1404, and respectfully request your "no" vote when this measure is heard 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 Revenue and Taxation Committee
Colin Grinnell, Chief Consultant, Senate Revenue and Taxation Committee
Ryan Eisberg, Policy Consultant, Senate Republican Caucus

April 21, 2026

The Honorable Buffy Wicks
Chair, California State Assembly Committee on Appropriations
1021 O St, Room 8220
Sacramento, CA 95814

RE: AB 1821 (Pacheco) California Public Records Act: agency response time. As Amended April 6, 2026 – SUPPORT

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.

We appreciate the author's efforts and remain committed to continued conversations about broader CPRA reform. The business-day clarification 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
Senior Legislative Advocate
California State Association of Counties
elawyer@counties.org

Johnnie Pina
Legislative Advocate
League of California Cities
Jpina@calcities.org

Ethan Nagler
Legislative Representative
California Municipal Clerks Association
enagler@publicpolicygroup.com

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

Jean Hurst
Legislative Representative

Urban Counties of California
jkh@hbeadvocacy.com

cc: The Honorable Blanca Pacheco, Member, California State Assembly
Members, Assembly Committee on Appropriations
Shiran Zohar, Principal Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

April 22, 2026

The Honorable Mike Gipson
Chair, Assembly Revenue & Taxation Committee
1020 N St, Rm 167A
Sacramento, CA 95814

RE: Assembly Bill 2705 (Dixon) Property taxation: tax-defaulted property sales: excess proceeds claims.
As introduced February 20, 2026 – SUPPORT
To be heard in Assembly Committee on Revenue and Taxation
April 27, 2026

Dear Chair Gipson,

On behalf of the California State Association of Counties (CSAC) and Urban Counites of California (UCC), we are pleased to support Assembly Bill 2705 (Dixon), which establishes important consumer protections and simplifies the process for the recovery of excess proceeds from the sale of a tax-defaulted property.

Counties are required by law to conduct tax-defaulted property sales and to hold and distribute excess proceeds to rightful claimants through a county-administered claims process. Under current law, claimants have one year to file a claim following the tax collector's deed being recorded. In recent years, private "asset finder" companies have moved into this space, offering a "middle man" service to consumers to file these claims for a fee, even though consumers can already file a claim with the county themselves free of charge. In many cases, these companies charge significant or excessive fees for what is largely an administrative process, and consumers may not be aware that they can recover these funds on their own at no cost. Additionally, existing law lacks consistent statewide standards governing these practices, creating

a gap in consumer protections and administrative challenges for county tax collectors.

County reports have identified recurring concerns with asset finder companies, including misleading representations, aggressive solicitation practices, and attempts to improperly establish themselves as parties of interest. Without clear statewide standards, these practices can undermine the integrity of the excess proceeds process and reduce the funds ultimately returned to rightful claimants.

Counties across California regularly hold millions of dollars in excess proceeds for rightful claimants each year. For example, Los Angeles County reports holding approximately $7 million annually in excess proceeds, while Riverside County reports holding approximately $11 million. These figures underscore the significant financial stakes statewide and potential harm when claimants are misled or charged excessive fees.

AB 2705 would protect consumers by establishing a uniform statewide framework for agreements to locate, recover, deliver, or assist in filing excess proceeds claims, including disclosures that the consumer may file their claim directly with the county at no cost, and information on how to do so. The bill would also require written agreements between the parties, prohibit the collection of fees prior to the approval and payment of a claim, and limit fees to no more than 10 percent of the excess proceeds awarded for those who do choose to file their claim with the assistance of another party. These provisions are modeled after existing safeguards in state unclaimed property law, providing a tested and balanced framework that strengthens consumer protections while allowing legitimate service providers to operate.

For these reasons, we are pleased to support AB 2705 and respectfully request your “aye” vote. Please do not hesitate to contact us if you have any questions.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties
ejungwirth@counties.org

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

cc: The Honorable Diane Dixon, Member of the California State Assembly
Members, Assembly Revenue & Taxation Committee
M. David Ruff, Chief Consultant, Assembly Revenue & Taxation Committee
Julia King, Consultant, Assembly Republican Caucus

April 22, 2026

The Honorable Diane Dixon
California State Assembly
1021 O St, Suite 5330
Sacramento, CA 95814

RE: Assembly Bill 2705 (Dixon) Property taxation: tax-defaulted property sales: excess proceeds claims.
As introduced February 20, 2026 – SUPPORT

Dear Chair Gipson,

On behalf of the California State Association of Counties (CSAC) and Urban Counites of California (UCC), we are pleased to support your Assembly Bill 2705, which establishes important consumer protections and simplifies the process for the recovery of excess proceeds from the sale of a tax-defaulted property.

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For these reasons, we are pleased to support AB 2705. Please do not hesitate to contact us if you have any questions.

Sincerely,

Emma Jungwirth
Senior Legislative Advocate
California State Association of Counties
ejungwirth@counties.org

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

California Coalition on Workers' Compensation
CCWC
California Restaurant Association
California Hotel & Lodging Association
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
California Retailers Association
Consumers Economy Jobs
Allied Managed Care Incorporated
California Trucking Association
We drive for a living. Safety is our priority.
ABC California
PRISM
Public Risk Innovation, Solutions, and Management
California Hospital Association
CAL SMACNA
CSAC
NFIB
RCRC
California Attractions and Parks Association
CAPA
CCBA
CBIA
California Building Industry Association
CSDA
Flasher Barricade Assn.
cga
Reed Family Companies
Caring for our people, customers, communities, and environments
Gateway Chambers Alliance
CFCA
California Fuels + Convenience Alliance
California Association of Winegrape Growers
California JPIA
Networks By Design
NAIOP
Commercial Real Estate Development Association
SoCal Chapter
California Self-Insurers' Security Fund
Calforests
California Forestry Association
American Property Casualty Insurance Association
AIMS
Acclamation Insurance Management Services
The Associated General Contractors San Diego Chapter
SIG
Schools Insurance Group
NonProfits United
Lien On Me, Inc.
PIPS
The Protected Insurance Program for Schools & Community Colleges Joint Powers Authority
Norwalk Chamber of Commerce
SWCLC
Southwest California Legislative Council
Associated General Contractors California
CSIA
California Self-Insurers Association
danville area
Chamber of Commerce
The Chamber
Long Beach Area Chamber of Commerce
Oceanside
Chamber of Commerce
Advancing Oceanside
Santa Clarita Valley
Chamber of Commerce
Murrieta/Wildomar
Chamber of Commerce
Greater Bakersfield Chamber
Building Something Better
Mission Viejo Chamber of Commerce
Making Business Happen
Brea Chamber
Catalyst. Convener. Champion.
Carlsbad
Chamber of Commerce
palm desert area
chamber of commerce
California Farm Bureau.
Standing up for all farmers and ranchers
Corona Chamber of Commerce

April 22, 2026

The Honorable John Laird
Chair, Senate Committee on Budget & Fiscal Review
1020 N Street, Suite 502
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

Subject: Subsequent Injuries Benefit Trust Fund (SIBTF) Liabilities

Dear Senate Budget and Senate Budget Subcommittee 5 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).

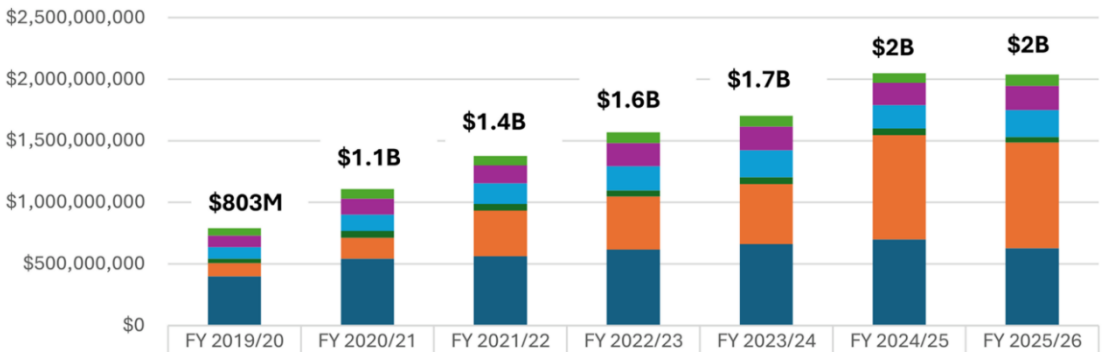
In 1945, California set up a subsequent injury fund as part of our workers' compensation system, primarily to incentivize employers to hire disabled war veterans in an era that predated state and federal fair employment laws. The intent of the special fund was to compensate workers beyond the standard 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.

Employer Assessments 2019/20 - 2025/26

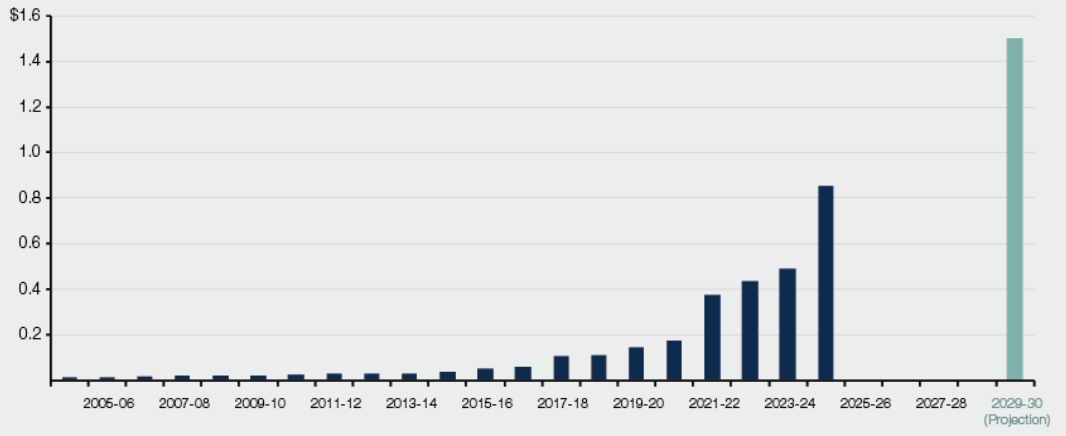


	FY 2019/20	FY 2020/21	FY 2021/22	FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26
FRAUD	$72,138,372	$77,909,442	$77,909,442	$87,842,896	$86,985,892	$90,435,332	92,235,040
LECF	$93,539,146	$129,025,296	$143,662,000	$187,857,815	$192,542,166	$181,983,628	197,851,278
OSHF	$93,480,750	$132,411,468	$168,104,708	$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

WCARF SIBTF UEBTF OSHF LECF FRAUD

Figure 6

Subsequent Injury Benefit Employer Taxes
(In Billions)



2029-30 projection based on Department of Industrial Relations assessment of recent program trends.

LAO

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 Bureau, Bryan Little
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
Corona Chamber of Commerce, Tim Gramling
Danville Area Chamber of Commerce, Amy Millington
Flasher Barricade Association (FBA), Kenneth Johnston
Gateway Chamber of Commerce, Caren Spilsbury
Greater Bakersfield Chamber, Joel Paramo

Lien 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
Self-Insurers' Security Fund (SISF), Jill Dulich
Southwest California Legislative Council, Adam A. Ruiz

cc: The Honorable Jesse Gabriel
Chair, Assembly Committee on Budget

The Honorable Sharon Quirk-Silva
Chair, Assembly Budget Subcommittee No. 5 on State Administration

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

Nora Brackbill, Consultant
Senate Budget and Fiscal Review Committee

Guy Strahl, Consultant
Assembly Budget Committee

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

April 22, 2026

The Honorable Mark González
California State Assembly
1021 O Street, Suite 6150
Sacramento, CA 95814

RE: AB 1607 (González) Emergency medical services
As Introduced March 26, 2026 – SUPPORT

Dear Assemblymember González:

On behalf of the California State Association of Counties (CSAC), representing all 58 California counties, I write in support of your Assembly Bill 1607. This measure would extend the sunset date on the Maddy Emergency Medical Services (EMS) Fund until January 1, 2037, preserving access to critical, life-saving emergency medical care.

Under current law, counties may establish a Maddy EMS Fund through a resolution by the board of supervisors electing to levy a $2 fee for every $10 of fines on all crimes, penalties, or forfeitures imposed by the court. These funds are used to reimburse physicians and hospitals who treat uninsured patients in emergency departments, as well as providing funding for local EMS purposes. Additionally, 15 percent of the funds collected are allocated to the "Richie's Fund," which supports pediatric trauma centers.

Emergency departments are required to provide care for patients regardless of their health care coverage status. When an uninsured patient is unable to pay for their care, a hospital or physician may submit for reimbursement to their county's Maddy Fund if they are located in one of the 51 counties with an established Maddy EMS Fund. While these funds do not fully offset the cost of uncompensated care, they provide a critical financial lifeline to emergency departments already under significant fiscal strain.

Absent legislative action, the statutory authority for the Maddy Fund will sunset on January 1, 2027, eliminating this important source of financial assistance for providers. At the same time, millions of Californians are at risk of losing their health care coverage as H.R. 1 is implemented, including new Medi-Cal work requirements beginning in 2027. As the number

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CEO Graham Knaus

of uninsured individuals increases, demand for emergency services will grow, placing additional pressure on already financially fragile safety-net providers. Without the Maddy Fund, some emergency departments may be forced to reduce services or close altogether, impacting access to care for entire communities.

AB 1607 would extend the Maddy EMS Fund for an additional ten years, until January 1, 2037, ensuring continued support for emergency care providers and the patients who rely on them. For these reasons, CSAC is pleased to support AB 1607. Should you have any questions regarding our position, please do not hesitate to contact me at bmccarthy@counties.org.

Sincerely,

Brendan McCarthy
Senior Legislative Advocate

April 21, 2026

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The Honorable Jessica M. Caloza
California State Assembly
1021 O Street, Room 5620
Sacramento, CA 95814

RE: HR 95 (Caloza): National Public Works Week
Notice of SUPPORT

Dear Assemblymember Caloza,

On behalf of the California State Association of Counties (CSAC), representing all 58 counties, we are proud to express our strong support for House Resolution (HR) 95 (Caloza), which would designate May 18 through May 24 as National Public Works Week in California. County public works professionals are responsible for the daily functioning, safety, and long-term resilience of our communities. They plan, design, construct, operate, and maintain the critical infrastructure systems that residents and businesses depend upon, including roads and bridges, drinking water and wastewater systems, stormwater infrastructure, public facilities, and transportation networks. Their work is fundamental to protecting public health through safe and reliable water and sanitation services, sustaining economic vitality by ensuring the efficient movement of goods and people, and enhancing quality of life through well-maintained and accessible public spaces.

Equally important, public works professionals serve as frontline emergency responders. During disasters and emergencies, local public works departments play a critical and highly visible role in both immediate response and long-term recovery. Their maintenance and operations personnel are often among the first to mobilize, clearing debris, restoring roadway access, and ensuring that police, fire, and emergency medical services can safely reach affected areas. In practice, public works professionals provide essential emergency support across a wide range of incidents. Following major wildfire events, crews remove hazardous debris and reopen critical transportation corridors, enabling life-saving response efforts. During flooding, they deploy pumps, reinforce levees, and actively manage stormwater systems to mitigate damage and protect homes and businesses. In the aftermath of earthquakes, they inspect and stabilize damaged infrastructure, restore mobility, and reestablish essential public services. These responsibilities, performed under challenging and often dangerous conditions, are vital to safeguarding communities and accelerating recovery. National Public

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Works Week provides an important opportunity to formally recognize the professionalism, expertise, and dedication of these individuals, while also elevating public awareness of the importance of sustained infrastructure investment, workforce development, and cultivating the next generation of public works leaders.

As California continues to confront growing challenges, including climate change, aging infrastructure, population growth, and evolving regulatory demands, recognizing and supporting the public works workforce is more important than ever. HR 95 appropriately acknowledges the essential role these professionals play and promotes greater public appreciation for the services that underpin the health, safety, and prosperity of our communities. For these reasons, CSAC proudly supports HR 95 (Caloza) and thanks you for your leadership in advancing this important resolution.

Sincerely,

Mark Neuburger
Legislative Advocate
California State Association of Counties

April 22, 2026

Mr. Ian Choudri
Chief Executive Officer
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

Re: 2026 Draft Business Plan Comments on Proposed Tax Increment Financing Authority

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 indication in the 2026 Draft Business Plan they are seeking authority to establish Tax Increment Financing (TIF) and Enhanced Infrastructure Financing Districts (EIFD).

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 on page 32 of the Authority's 2026 Draft Business Plan, 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 EIFD's and Community Revitalization and Investment Authorities (CRIAs), the broader fiscal ecosystem is interconnected. Reduced city and county 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 2026 Draft Business plan proposed that the authority be given the authority to initiate value-capture models 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 cities, counties and special districts 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.

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 eliminate this language from their Draft 2026 Business Plan and instead engage collaboratively with local governments to identify funding strategies that consider both statewide infrastructure goals and local fiscal integrity.

Sincerely,

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CC: 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

June 5, 2026

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

Re: **AB 1337 (Ward): Information Practices Act of 1977**
As amended June 1, 2026 – OPPOSE
To be heard in the Senate Committee on Privacy, Digital Technologies, and Consumer Protection June 15, 2026

Dear Chair Cabaldon,

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), California Special Districts Association (CSDA), the Association of California Healthcare Districts (ACHD), County Welfare Directors Association of California (CWDA), California Association of Public Hospitals (CAPH), California Association of Joint Powers Authorities (CAJPA), the County Health Executives Association of California (CHEAC), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Municipal Clerks Association (CMCA), the District Hospital Leadership Forum (DHLF), the California Hospitals Association (CHA), the California Association of Recreation and Park Districts (CARPD), the Emergency Medical Services Administrators' Association of California (EMSAAC), and the California Behavioral Health Directors Association (CBHDA), we write to respectfully oppose AB 1337 (Ward), which would amend the Information Practices Act of 1977 ("IPA," or "the

Act") and apply it to all 58 counties, 483 cities, over 1,000 school districts and county offices of education, approximately 2,200 independent special districts, and the hundreds of JPAs, regional bodies, and other public agencies.

AB 1337 raises significant questions regarding how state and local agencies can continue to operate critical safety net programs and impose severe restrictions on data sharing in ways that undermine integrated service approaches that support timely and efficient access to essential benefits for Californians.

AB 1337 ignores the myriad of privacy and confidentiality laws already in place for local governments and, instead, imposes an unclear set of provisions that create conflicts with longstanding confidentiality laws, complicate data reporting needed for accountability efforts, and endanger federal funding, among other risks. This is a costly, unnecessary change that could jeopardize essential services and harm the communities we serve: students, the unhoused, the elderly, and those on the economic margins who rely on public services for healthcare, housing, energy, and the services that comprise the social safety net.

While AB 1337 has many provisions, at its core are three new overlapping restrictions for how local agencies manage public data:

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

Amendments Do Not Address Core Concerns

The proposed amendments fail to resolve our core concerns with the bill. Even with the proposed amendments, AB 1337 continues to severely restrict how local agencies and the state can use, transfer, or report public data and subjects public agencies to significant costs and implementation challenges. These challenges would include overhaul and, likely, replacement of systems and databases used to store personal information, substantial new training and compliance costs, and interpretation questions that would undoubtedly require resolution through litigation.

Creation and maintenance of databases require considerable resources and time. For example, the California Statewide Automated Welfare System (CalSAWS) is used by all 58 counties to streamline eligibility determination, enrollment, and case management for CalWORKs, CalFresh, Medi-Cal CMSP, foster care, and other social safety net programs. The project required many years of work and resources before it could be adopted statewide[1]. AB 1337 could completely undo those efforts and require a full redesign of the system, with just a year to accomplish it and unknown impacts to actual service delivery. This is just one example of the costly and labor-intensive efforts that would be required by this bill. Countless other programs at the state and local level would require a similar rapid overhaul, compelling like changes to databases, data use agreements, bargaining agreements, policies, and general operations.

While the costs, liability, and burdensome compliance are certainly a top concern, our primary reason for opposing the bill is due to the bill's negative impacts on delivery of services by public agencies. H.R. 1 was designed to remove millions from Medi-Cal and CalFresh through the burdens of paperwork. AB 1337 would compound the consequences of that law and make it even harder for Californians to access needed services.

Complicates Data Sharing and Reporting

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

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

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

[1] CalSAWS Executive Overview

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

By requiring individuals to opt into data sharing, reporting will be biased towards those who choose to opt into sharing their data – creating unknown impacts that will make it harder to discern which populations are underrepresented in service delivery. Civil Code § 1798.24 would prohibit agencies from disclosing any data that *could* identify an individual, rather than the current standard that disclosure *would* identify an individual. This change could have a severe chilling effect on reporting outcomes of public services. Public employees could reasonably choose not to publish reports that, while designed to account for service delivery across demographic and economic strata, could place them at risk of a misdemeanor. We are concerned this provision could undermine the understanding of how agencies succeed or fail to deliver services, weakening public accountability.

Hampers Abilities to Respond to Unlawful Activity

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

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

For agencies responsible for child and family services, this change could restrict information sharing with law enforcement in ways that could endanger child safety and make it harder for those agencies to evaluate risk and safety. Social workers could be held liable with a misdemeanor or termination for attempting to ensure child safety – an outcome that is clearly not the intent of this bill, but an example of the unintended consequences created when bills are drafted without an understanding of the practical application of its language or the input of impacted local agencies.

Expands Legal Liability for Public Agencies and their Workforce

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

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

Ignores and Conflicts with Existing Privacy and Confidentiality Laws

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

Health

- The Health Insurance Portability and Accountability Act (HIPAA) and the Confidentiality of Medical Information Act (CMIA) regarding Medi-Cal beneficiaries and those receiving care at public hospitals;
- 42 CFR Part 2 for confidentiality of substance use disorder patient records;
- Welfare and Institutions Code (WIC) § 5325.1 regarding the right to privacy for persons receiving treatment for a mental illness;
- WIC § 827 regarding the right to privacy for juvenile records; and
- Penal Code § 13823.5(c)(2) regarding confidentiality of sexual assault examination records.

Social Services

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

Elections

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

Schools

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

Criminal Justice

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

Finance

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

Public Utilities

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

Libraries

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

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

Put simply, local agencies take data privacy and confidentiality seriously and comply with a network of specific privacy and confidentiality laws. AB 1337 upends this longstanding framework with a blanket policy that directly conflicts with many existing laws or creates confusion and inconsistent compliance based on how agencies are used to compliance. While the California Consumer Privacy Act expressly provides that its requirements do not apply to information governed by CMIA, AB 1337 provides an unclear acknowledgement of its conflicts with CMIA.

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

To cite another conflict, HIPAA allows covered entities to disclose protected health information without an individual's consent for purposes including treatment, payment, or health care operations[2]. AB 1337 ignores these carefully designed rules and imposes significant uncertainty as to how patient data can be shared for delivery of medical care by public hospital systems.

County child welfare and behavioral services laws restrict even acknowledging whether an individual is receiving care, unless an entity is specifically authorized by law[3]. AB 1337 establishes contrary rules that endanger child privacy by allowing for

[2] 5 C.F.R. § 164.502(a)(1)

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

the release of information upon consent and by other circumstances established in Civil Code § 1798.24.

Endangers Federal Funding

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

Imposes Expensive and Sudden Requirements on Local Agencies

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

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

Even though section 32 of the bill asserts that no reimbursement is required by the act, we believe the bill clearly mandates considerable new obligations for local agencies: compliance with the IPA, which requires significant changes to software, internal practices, and duties of local agency workforces.

To add to these challenges, the bill allows state and local agencies little time to prepare for compliance. Because the bill would take effect January 1, 2028, and because state and local agencies may not know if the bill will become law until the Governor's September 30, 2026, deadline to sign or veto bills, state and local agencies could have a little more than a year to prepare for compliance with the amended IPA. Agencies would be compelled to rapidly complete legal review, train staff, update forms, and implement new procedures for data management without

any financial resources and in the midst of the dramatic workload changes that are anticipated with implementation of H.R. 1.

Heightens fiscal pressure on public agencies
Public agencies are facing considerable cost pressure from all fronts and AB 1337 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing statutory protections for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment, growing special education program demands and health care costs. For counties, implementation of H.R. 1. is expected to result in up to $9.5 billion in new annual costs to counties once fully implemented as it fundamentally shifts certain administrative fiscal responsibilities for safety net programs to counties. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million-dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

Put simply, we do not believe the costs, burden, and risks brought by this bill are necessary for public agencies.

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

Sincerely,

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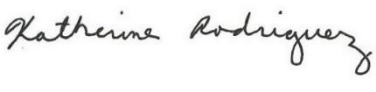

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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Christian Kurpiewski, Chief Consultant, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Morgan Branch, Policy Consultant, Senate Republican Caucus

June 10, 2026

The Honorable Tom Umberg, Chair
Senate Judiciary Committee
1021 O Street, Suite 6610
Sacramento, CA 95814

Re: **AB 1908 (McKinnor): Civil actions: victims' compensation funding: validating proceedings**
As revised 6/3/26 – SUPPORT
Set for hearing 6/23/26 – Senate Judiciary Committee

Dear Senator Umberg:

On behalf of the Urban Counties of California (UCC) and the California State Association of Counties, we write to express our support for Assembly Bill 1908, Assembly Member McKinnor's measure that would provide clarification to the existing law related to validation actions to specify that bonds and other forms of debt financing necessary to satisfy the obligations of a victims' compensation fund is authorized as of the date the establishment of such a fund via the adoption of a resolution or ordinance by a county board of supervisors. This important legislation will assist those counties seeking to finance a victims' compensation fund.

As you are keenly aware, counties, as well as other local agencies, are facing significant legal exposure and considerable costs for civil claims. As a result, funding these claims has become especially difficult. Los Angeles County, for example, faces many billions of dollars in liability stemming from claims of childhood sexual assaults occurring at several county-run youth facilities. One avenue to help facilitate payments to claimants is a self-funded victims' compensation fund. The challenge, however, is financing the fund when cash is not readily available. Obligation bonds are commonly used to pay awards from bench and jury trials, as well as court-approved settlements. Current law, however, limits their use to these types of legal obligations. The Code of Civil Procedure does not allow obligation bonds to finance a victims' fund. AB 1908 provides the legal mechanism to do exactly that.

AB 1908 addresses a statutory gap by giving counties the flexibility to consider creating a victims' fund to cover civil liabilities that are so large as to necessitate the use of obligation bonds. As a result, we support AB 1908 and respectfully request your "aye" vote.

Please do not hesitate to reach out if you have questions regarding our position.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties

cc: Members and Consultants, Senate Judiciary Committee
The Honorable Tina McKinnor, California State Assembly
Andi Leibenbaum, County of Los Angeles

June 10, 2026

The Honorable Tom Umberg, Chair
Senate Judiciary Committee
1021 O Street, Suite 6610
Sacramento, CA 95814

Re: **AB 1908 (McKinnor): Civil actions: victims' compensation funding: validating proceedings**
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Set for hearing 6/23/26 – Senate Judiciary Committee

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Please do not hesitate to reach out if you have questions regarding our position.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Eric Lawyer
Senior Legislative Advocate
California State Association of Counties

cc: Members and Consultants, Senate Judiciary Committee
The Honorable Tina McKinnor, California State Assembly
Andi Leibenbaum, County of Los Angeles

June 10, 2026

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

Re: **Assembly Bill 1961 (Ahrens). Civil actions: protective orders: workplace violence.**
As Amended April 16, 2026 – SUPPORT
To be heard in Senate Judiciary Committee on June 16, 2026

Dear Chair Umberg,

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), California Association of Joint Powers Authorities (CAJPA), and the California Special Districts Association (CSDA), 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 from the public. In recent years, county registrars have faced bomb threats[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 all employees at the employer's workplace or a location where a group of employees perform their primary job duties. 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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[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)

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Aaron Avery
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CC: The Honorable Patrick Ahrens, Member, California State Assembly
Members and Consultants, Senate Judiciary Committee
Margie Estrada, Chief Consultant, Senate Judiciary Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

June 9, 2026

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

RE: AB 2341 (Fong) Local government: emergency response services: use of languages other than English.
As amended June 4, 2026 – SUPPORT
To be heard in the Senate Committee on Emergency Management on June 16, 2026

Dear Chair Stern,

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
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Jean Hurst
Legislative Representative
Urban Counties of California
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CC: The Honorable Mike Fong, Member, California State Assembly
Members and Consultants, Senate Committee on Emergency Management
Cassie Royce Flemming, Principal Consultant, Senate Committee on Emergency Management
Ryan Eisberg, Policy Consultant, Senate Republican Caucus

June 10, 2026

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

Re: **Assembly Bill 2545 (Schiavo). Report: labor force impact: artificial intelligence.**
As Amended April 14, 2026 - Support if Amended.
To be heard in the Senate Committee on Labor, Public Employment and Retirement June 17, 2026.

Dear Chair Smallwood Cuevas,

On behalf of the California State Association of Counties (CSAC) and Urban Counties of California (UCC), League of California Cities (Cal Cities), and the Association of California School Administrators (ACSA), 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.

We respectfully request that a local agency employer representative 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 and avoid potential future costs or unfunded mandates for local governments. While we have concerns regarding other legislation that is designed to limit, regulate, or prohibit new technologies in the workplace, AB 2545 takes better approach: evaluate the impacts of AI systems analytically before imposing new restrictions.

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,

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CC: The Honorable Pilar Schiavo, Member, California State Assembly
Members and Consultants, Senate Committee on Labor, Public Employment and Retirement
Alma Perez, Chief Consultant, Senate Committee on Labor, Public Employment and Retirement
Jesse Herzer, Policy Consultant, Republican Caucus

June 12, 2026

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

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As amended April 9, 2026 – SUPPORT
To be heard in Senate Local Government Committee on June 17, 2026

Dear Chair Durazo:

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.

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

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.

Sincerely,

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CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Senate Local Government Committee
Anton Favorini-Csorba, Chief Consultant, Senate Local Government Committee
Ryan Eisberg, Policy Consultant, Senate Republican Caucus

June 11, 2026

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

Re: **AB 2656 (Petrie-Norris): Public employees: notice: artificial intelligence performing service within scope of work**
As amended 4/14/26 – OPPOSE
Set for hearing 6/17/26 – Senate Labor, Public Employment, and Retirement Committee

Dear Senator Smallwood-Cuevas:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the California State Association of Counties (CSAC), the California Special Districts Association (CSDA), the League of California Cities (CalCities), the California Association of Recreation and Park Districts (CARPD), the Association of California School Administrators (ACSA), and Public Risk, Innovation, Solutions, and Management (PRISM), we respectfully write to share our 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.

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) and Ralph C. Dills Act, 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, non-education 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.

AB 2656 appears to be a solution without a clearly identified problem. 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

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Jason Schmelzer
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Johnnie Pina
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Dorothy Johnson
Legislative Advocate
Association of California School Administrators

cc: The Honorable Cottie Petrie-Norris, California State Assembly
Members and Consultants, Senate Labor, Public Employment, and Retirement Committee

June 9, 2026

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

RE: Senate Bill 936 (Blakespear) – SUPPORT
As Amended May 18, 2026

Dear Assemblymember Berman:

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]

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

[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.

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.

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 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,

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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
Members of the Assembly Business and Professions Committee
Robert Sumner, Chief Consultant, Assembly Business and Professions Committee
Bill Lewis, Consultant, Assembly Republican Caucus

June 9, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended June 4, 2026)*

Dear Chair Kalra:

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, Public Risk Innovation, Solutions, and Management, California Association of Recreation and Park Districts, and California County Superintendents 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 ways 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 notable and costly steps backwards from the enrolled version of SB 7, directly

implicating the concerns raised by the Governor. Specifically, 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, when an employer relies primarily on ADS output to make a discipline, termination, or deactivation decision. 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 whenever an ADS output is primarily relied on to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. Increasing the burdens of compliance will deter local governments from using these important 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 as well as Proposition 98 dollars intended for students and classrooms.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For schools, this is a direct drain on Prop 98 funding. 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, and schools facing declining enrollment, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Further, 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.

Applying SB 947 to Public Employers May Lead to Unintended Consequences
Local governments and local 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 these 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 primarily relied on to make a discipline, termination, or deactivation decision – a line which may not

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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. The carve out introduces significant legal uncertainty by requiring employers, employee organizations, and ultimately the courts to determine when a particular negotiated provision is sufficient to displace the statutory requirements. 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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Honorable Members, Assembly Judiciary Committee
Thomas Clark, Principal Consultant, Assembly Judiciary Committee
Tess Scherkenback, Consultant, Assembly Republican Caucus
Luke Reidenbach, Chief Deputy Legislative Secretary, Office of
Governor Gavin Newsom

June 9, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended June 4, 2026)*

Dear Chair Ortega:

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, Public Risk Innovation, Solutions, and Management, California Association of Recreation and Park Districts, and California County Superintendents 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 ways 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 notable and costly steps backwards from the enrolled version of SB 7, directly

implicating the concerns raised by the Governor. Specifically, 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, when an employer relies primarily on ADS output to make a discipline, termination, or deactivation decision. 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 whenever an ADS output is primarily relied on to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. Increasing the burdens of compliance will deter local governments from using these important 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 as well as Proposition 98 dollars intended for students and classrooms.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For schools, this is a direct drain on Prop 98 funding. 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, and schools facing declining enrollment, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Further, 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.

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Luke Reidenbach, Chief Deputy Legislative Secretary, Office of
Governor Gavin Newsom

June 9, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended June 4, 2026)*

Dear Chair Bauer-Kahan:

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, Public Risk Innovation, Solutions, and Management, California Association of Recreation and Park Districts, and California County Superintendents 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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Luke Reidenbach, Chief Deputy Legislative Secretary, Office of
Governor Gavin Newsom

June 9, 2026

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

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

Dear Chair Kalra,

On behalf of the County Behavioral Health Directors Association (CBHDA), the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Public Administrators, Public Guardians and Public Conservators (CAPAPGPC), **we write to share our opposition to Senate Bill 1016 (Blakespear), as amended on May 14, 2026.** SB 1016 fundamentally changes the voluntary nature of CARE and explicitly contradicts the expressed goal of the CARE ACT to decrease involuntary conservatorships, by introducing an involuntary pathway while simultaneously bypassing due process protections.

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

- **CARE Court petitions can be dismissed for a wide range of reasons, including failure of the respondent to engage in the process or show up in court.** This bill would allow for a court to order an involuntary mental health evaluation for the purposes of LPS when a CARE Court petition is dismissed and it finds that there is probable cause to determine that a person meets LPS criteria. Given that some courts are allowing petitions without substantive documentation of an individual's condition or independent clinical review, and without the county's ability to verify allegations made by petitioners, counties may be ordered by the court to involuntarily detain and evaluate individuals for whom an involuntary evaluation is not necessary or reasonable. Involuntary detention can be incredibly intrusive, and even traumatic; as such, the existing law attempts to establish a reasonably high bar for exercising this authority. By attaching the court-ordered involuntary evaluation to petitions that are dismissed, this law would potentially lead to unfounded involuntary detentions and evaluations, leading to a diversion of county behavioral health staff away from individuals who are more in need.

- **Gives the Court the authority to weigh in on an individual's motivation and degree of insight into their condition, without appropriate training or evidence.** Throughout SB 1016, it is stated that a reason for the court to find an individual eligible for a court ordered involuntary evaluation could be their lack of insight into their mental disorder. Courts are not clinicians, and given that the purpose of this bill is to force an evaluation, a person's insight into their mental health condition would not be known. The purpose of a mental health evaluation would be to make such a determination. Conversely, a lack of engagement in CARE Court proceedings would not necessarily be indicative of an individual's dangerousness to self or others, thereby creating a new, lower bar for establishing sufficient evidence that an individual might be in need of involuntary detention.

  Bypasses due process protections required under LPS Welfare and Institutions Code Sections 5200-5204. The provisions in this bill would increase a court's discretion over county behavioral health's clinical ability to properly assess and provide the court with evidence of probable cause for LPS criteria to be met for someone who is petitioned for an involuntary evaluation. The bill omits key legal standards currently outlined in WIC 5202, which explicitly states that a county-designated individual must prepare a prepetition screening and shall conduct "a reasonable investigation of the allegations and make a reasonable effort to personally interview the subject of the petition". Instead, this bill requires a court to substitute the CARE Act petition dismissal form for a court ordered involuntary evaluation under this pathway[1], bypassing multiple built-in due process protections.

- **Introduces 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.

[1] As proposed under WIC 5975 (e)(3).

- **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. Further, WIC 5203 would hold an individual liable for requesting a court-ordered evaluation if they know that an individual does not meet LPS criteria. These protections would be bypassed in this bill for individuals coming through the CARE pathway.

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 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 and due process 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,

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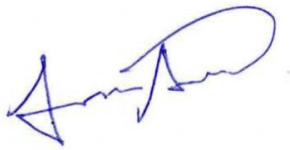

Tom Scott, Executive Director
California Association of Public Administrators,
Public Guardians, and Public Conservators
tscott@capapgpc.org

CC: Honorable Senator Catherine Blakespear
Honorable Members of the Assembly Judiciary Committee
Kristian Wright, Counsel, Assembly Judiciary Committee
Tom Clark, Counsel, Assembly Judiciary Committee

Climate Resolve
League of California Cities
Calleguas Municipal Water District
Sweetwater Authority
Greater Valley Conservation Corps
CALCC
Bay Planning Coalition
San Gorgonio Pass Water Agency
Established 1961
The Public Motive is the Noblest Motive
EHL
The Conservation Fund
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Greater San Diego County
thenat
San Diego Natural History Museum
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Sonoma County
San Diego Zoo Wildlife Alliance
WaterReuse California
Coastal Corridor Alliance
MSWD
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CWA
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Valley Water
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Learning • Earning • Conserving
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Sonoma Land Trust
Fire Districts Association of California
1972
San Joaquin Valley Water Collaborative Action Program
Sacramento Regional Conservation Corps
SRCC
Training Tomorrow's Workforce
Carbon Cycle Institute
AIM
Agricultural Institute of Marin
CCEJN
Central California Environmental Justice Network
Irvine Ranch Water District
Save the Redwoods League
City of Roseville California
Kern County Water Agency
BAYAREA COUNCIL
Cesar Chavez Environmental Corps
Field
WCN
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Los Angeles Neighborhood Land Trust
Friends of Harbors, Beaches and Parks
Fresno EOC
Local Conservation Corps
Community Water Center
El Centro Comunitario por el Agua
The Metropolitan Water District of Southern California
California Council of Land Trusts
CivicCorps
Oakland, California
emwd
Eastern Municipal Water District
Mojave Water Agency
Land Trust
Santa Cruz County
CSAC
Sempervirens Fund
CASQA
California Stormwater Quality Association
California Association of Resource Conservation Districts
San Jose Conservation Corps + Charter School
Clean Water Action
Southern California Mountains Foundation
Urban Conservation Corps
Bolsa Chica Land Trust
Preserving All of Bolsa Chica
The Wildlands Conservancy
KRCD
Kings River Conservation District
CARPD
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Sonoma Water
Napa County Regional Park & Open Space District
Water Blueprint
for the San Joaquin Valley
Advocacy Fund
Big Sur Land Trust
For the lands you love
Upper San Luis Rey Resource Conservation District
PCWA
NCWA
Northern California Water Association
Bay Area Ridge Trail
POST
TEAM
Temecula-Elsinore Anza Murrieta
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Outward Bound
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SWID
Shafter-Wasco Irrigation District
CHCPC
California Habitat Conservation Planning Coalition
Hi-Desert Water District
Open Space Authority
Santa Clara Valley
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Transforming Youth. Enhancing Communities.
Western Municipal Water District
Sequoia Community Corps
A California Certified Conservation Corps
CAL-IPC
California Invasive Plant Council
The Wilderness Society
California Fire Chiefs Association
Monterey One Water
RCRC
WQA
San Gabriel Basin Water Quality Authority
Save Mount Diablo
Preserve • Defend • Restore • Educate • Enjoy
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CASA
Rails to Trails conservancy
California State Parks Foundation
California
Groundwater Coalition
Sacramento Area Sewer District
SCWC
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Rancho Water
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Santa Margarita Water District
OCCC
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Orange County Conservation Corps

May 27, 2026

The Honorable Josh Becker
Chair, Senate Natural Resources and Water Committee
1021 O Street, Suite 3220
Sacramento, CA 95814

RE: SUPPORT – AB 35 (Alvarez): Proposition 4 Administrative Procedure Act (APA) Exemption
SET FOR JUNE 9th, 2026

Dear Chair Becker,

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 Recreation and Park Districts

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 Groundwater Coalition

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)

California Water Association

Calleguas Municipal Water District

Carbon Cycle Institute

Central California Environmental Justice Network

Cesar Chavez Environmental Corp (CCEC)

City of Roseville

City of Sacramento

Civicorps

Clean Water Action

Climate Resolve

Coastal Corridor Alliance

Collaborate Action Program

Community Water Center

Conservation Corps North Bay

Conservation Corps of Long Beach

County of San Diego

Crescenta Valley Water District

East Bay Regional Park District

East Contra Costa County Habitat Conservancy

Eastern Municipal Water District

El Dorado Water Agency

Endangered Habitats League

Fire District Association of California

Fresno EOC Local Conservation Corps

Friends of Harbors Beaches and Parks

Greater Valley Conservation Corps

Hi-Desert Water District

Inland Empire Utilities Agency

Irvine Ranch Water District

Kern County Water Agency

Kings River Conservation District

Land Trust of Santa Cruz County

League of California Cities

Los Angeles Conservation Corps

Los Angeles Neighborhood Land Trust

Metropolitan Water District of Southern California

Midpeninsula Regional Open Space District

Mission Springs Water District

Mojave Water Agency

Monterey One Water

Napa County Regional Park and Open Space District

Northern California Water Association

Orange County Conservation Corps

Otay Water District

Outward Bound Adventures (OBA)

Peninsula Open Space Trust

Placer County Water Agency

Rails to Trails Conservancy

Rancho California Water District

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 Gabriel Basin Water Quality Authority

San Gorgonio Pass Water Agency

San Joaquin Valley Water Collaborative Action Program

San Jose Conservation Corps

San Juan Water District

San Luis & Delta Mendota Water Authority

Santa Clara Valley Open Space Authority

Santa Margarita Water District

Save Mount Diablo

Save the Redwoods League

Sempervirens Fund

Sequoia Community Corps

Shafter-Wasco Irrigation District

Sloughhouse Resource Conservation District

Sonoma County Ag + Open Space

Sonoma Land Trust

Sonoma Water

Southern California Mountains Foundation

Southern California Water Coalition

Sweetwater Authority

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

Urban Counties of California

Valley Water

Water Blueprint for the San Joaquin Valley Advocacy Fund

Western Municipal Water District

June 3, 2026

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

RE: Assembly Bill 1198 (Haney) – OPPOSE UNLESS AMENDED
As Amended on January 22, 2026

Dear Chair Smallwood-Cuevas,

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 Transit Association (Cal Transit) 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, 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. While we appreciate the author's efforts to narrow the bill and acknowledgment that the intent is to address a limited set of large, long-duration projects, we remain concerned that the measure could create significant uncertainty in public contracting, increase taxpayer costs, and jeopardize the delivery of critical public infrastructure projects.

Under current law, 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. Contractors incorporate those known labor costs into their bids, allowing public agencies to accurately evaluate proposals, establish project budgets, secure financing, and award contracts with certainty. We are concerned that

further changes to the wages mid-stream will result in uncertainty in bidding and contracting and put projects in jeopardy.

For projects funded through fixed appropriations, grants, bond proceeds, voter-approved local revenues, or adopted local budgets, unexpected labor cost increases may require agencies to reduce project scope, delay construction, or cancel projects altogether. It would be challenging to predict how many future wage determinations could occur during the project period and adequately plan for cost increases, which may put potential projects at risk.

We believe there may be a path forward that addresses the concerns identified in Governor Newsom's veto of AB 2182 (Haney, 2024), which contained identical provisions to this bill, while preserving the author's intent to focus on a narrow category of large, long-term projects. Specifically, we encourage amendments that would limit the bill's applicability to projects that:

- Exceed $35 million in total project cost;
- Are anticipated to last more than 24 months; and
- Utilize alternative project delivery methods such as Design-Build (DB), Progressive Design-Build (PDB), Construction Manager/General Contractor (CM/GC), or similar delivery structures.

These amendments would better target the specific large, multiyear projects referenced in prior veto messages while avoiding impacts on the vast majority of traditional public works projects that are competitively bid and completed within a shorter timeframe.

In addition, we request consideration of amendments that would help preserve public contracting stability and reduce unintended impacts on local agencies, including:

- Require the state to fully reimburse local agencies for increased costs attributable to prevailing wage determinations issued after contract award;
- Exempt projects funded through voter-approved local measures, locally generated revenues, adopted local budgets, or time-sensitive state and federal grants where cost escalation or rebidding could jeopardize project delivery or funding eligibility;
- Exempt emergency response, public safety, wildfire, flood control, water, wastewater, and other critical infrastructure projects where procurement certainty and rapid delivery are essential;
- Require advance notice and fixed implementation windows for DIR determinations affecting active contracts to avoid mid-project procurement and pricing disruptions; and
- Clarify that contractors may not assert delay claims, suspend performance, or pursue damages against local agencies arising solely from DIR-issued prevailing wage updates.

By introducing additional cost uncertainty into public works contracting, the bill will increase overall project costs and further challenge the affordability of critical infrastructure investments for state and local governments. For these reasons, we respectfully oppose AB 1198 unless amended and look forward to continuing discussions with the author and committee staff to address these concerns. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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cc: The Honorable Matt Haney, Member of the California State Assembly
Members of the Senate Labor, Public Employment, and Retirement Committee
Alma Pérez, Chief Consultant, Senate Labor, Public Employment, and Retirement Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

June 4, 2026

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

RE: AB 1294 (Haney) Planning and Zoning: Housing Development: Standardized Application Form.
OPPOSE UNLESS AMEND *(As of 4/28/26)*

Dear Chair Durazo,

The League of California Cities (Cal Cities), the Rural County Representatives of California (RCRC), the Urban Counties of California (UCC) and the California State Association of Counties (CSAC) **continue to have a position of "oppose unless amended"** on **AB 1294 (Haney)** which would prohibit a local agency from collecting information necessary to determine if a project is consistent with the local agency's development standards. Even with recent amendments, AB 1294 would prevent local governments from fully understanding the impacts of proposed projects on public facilities and services, a key step in determining how best to provide necessary resources, infrastructure, and services to support the future residents of new developments in the local jurisdiction. The Housing Accountability Act allows a local agency to subject a project to its "ordinances, policies, and standards," but AB 1294 does not allow the local agency to request information to make that determination.

The Permit Streamlining Act requires each city and county to compile a list detailing the information required for a housing development project application and post it on its website. Within thirty calendar days of receiving an application, a city or county must determine whether the application is complete. An application is complete if it includes all the items on the list. No new information can be required of the applicant after the application is deemed complete. AB 1294 (Haney) places significant and serious limitations on the items that can be on a city or county's list.

AB 1294 (Haney) directs the Department of Housing and Community Development (HCD) to adopt a standardized application form that all cities and counties must use unless the local jurisdiction adopts its own templates and forms. A standardized housing application might move the application forward. However, the application itself must include sufficient information – such as the information excluded by Government Code Section 65941.2(b)(3) and (4) of the bill to allow a city or county to evaluate the proposed housing project for compliance with "ordinances, policies, and standards," and with the design and improvement requirements of the Subdivision Map Act.
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Cal Cities, RCRC, UCC, and CSAC support efforts to address the housing supply and affordability crisis that is gripping many regions of the state. These solutions include streamlining the housing approval process, creating a new state and local financial partnership to fund affordable housing and infrastructure projects, and consolidating important housing program grant applications. Unfortunately, by limiting information that can be considered during the entitlement process, AB 1294 will hamper the ability of local governments to ensure that housing projects meet the needs of residents and comply with important local requirements.

For these reasons, we must **regretfully must take a position of oppose unless amended AB 1294 (Haney)**. We appreciate the author's willingness to work with stakeholders to address these concerns and look forward to working together to find solutions. If you have any questions, do not hesitate to contact Brady Guertin (Cal Cities) at bguertin@calcities.org, Tracy Rhine (RCRC) at trhine@rcrcnet.org, Chris Lee (UCC) at clee@politicogroup.com or Mark Neuburger (CSAC) at mneuburger@counties.org.

Sincerely,

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Legislative Advocate

Tracy Rhine
Senior Policy Advocate, RCRC

Mark Neuburger
Legislative Advocate, CSAC

Christopher Lee
Legislative Advocate, UCC

Cc: The Honorable Matt Haney
Members, Senate Local Government Committee

June 1, 2026

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

Re: **AB 1337 (Ward): Information Practices Act of 1977**
As amended May 23, 2025 – OPPOSE
To be heard in the Senate Committee on Privacy, Digital Technologies, and Consumer Protection June 8, 2026

Dear Chair Cabaldon,

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

AB 1337 raises significant questions regarding how state and local agencies can continue to operate critical safety net programs and impose severe restrictions on data sharing in ways that undermine integrated service approaches that support timely and efficient access to essential benefits for Californians.

AB 1337 ignores the myriad of privacy and confidentiality laws already in place for local governments and, instead, imposes an unclear set of provisions that create conflicts with longstanding confidentiality laws, complicate data reporting needed for accountability efforts, and endanger federal funding, among other risks. This is a costly, unnecessary change that could jeopardize essential services and harm the communities we serve: students, the unhoused, the elderly, and those on the economic margins who rely on public services for healthcare, housing, energy, and the services that comprise the social safety net.

While AB 1337 has many provisions, at its core are three new overlapping restrictions for how local agencies manage public data:

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

Amendments Do Not Address Core Concerns

The proposed amendments fail to resolve our core concerns with the bill. Even with the proposed amendments, AB 1337 continues to severely restrict how local agencies and the state can use, transfer, or report public data and subjects public agencies to significant costs and implementation challenges. These challenges would include overhaul and, likely, replacement of systems and databases used to store personal information, substantial new training and compliance costs, and interpretation questions that would undoubtedly require resolution through litigation.

Creation and maintenance of databases requires considerable resources and time. For example, the California Statewide Automated Welfare System (CalSAWS) is used

by all 58 counties to streamline eligibility determination, enrollment, and case management for CalWORKs, CalFresh, Medi-Cal CMSP, foster care, and other social safety net programs. The project required many years of work and resources before it could be adopted statewide[1]. AB 1337 could completely undo those efforts and require a full redesign of the system, with just a year to accomplish it and unknown impacts to actual service delivery. This is just one example of the costly and labor-intensive efforts that would be required by this bill. Countless other programs at the state and local level would require a similar rapid overhaul, compelling like changes to databases, data use agreements, bargaining agreements, policies, and general operations.

While the costs, liability, and burdensome compliance are certainly a top concern, our primary reason for opposing the bill is due to the bill's negative impacts on delivery of services by public agencies. H.R. 1 was designed to remove millions from Medi-Cal and CalFresh through the burdens of paperwork. AB 1337 would compound the consequences of that law and make it even harder for Californians to access needed services.

Complicates Data Sharing and Reporting

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

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

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

AB 1337 would complicate the efforts of the CalAIM Justice-Involved initiative, which relies on information sharing to ensure that the justice-involved community is connected to healthcare services as they re-enter the community. These same

[1] CalSAWS Executive Overview

concerns apply to local reentry resource centers, which provide a range of services to help justice-involved individuals reestablish themselves in the community.

By requiring individuals to opt into data sharing, reporting will be biased towards those who choose to opt into sharing their data – creating unknown impacts that will make it harder to discern which populations are underrepresented in service delivery. Civil Code § 1798.24 would prohibit agencies from disclosing any data that *could* identify an individual, rather than the current standard that disclosure *would* identify an individual. This change could have a severe chilling effect on reporting outcomes of public services. Public employees could reasonably choose not to publish reports that, while designed to account for service delivery across demographic and economic strata, could place them at risk of a misdemeanor. We are concerned this provision could undermine the understanding of how agencies succeed or fail to deliver services, weakening public accountability.

Hampers Abilities to Respond to Unlawful Activity

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

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

For agencies responsible for child and family services, this change could restrict information sharing with law enforcement in ways that could endanger child safety and make it harder for those agencies to evaluate risk and safety. Social workers could be held liable with a misdemeanor or termination for attempting to ensure child safety – an outcome that is clearly not the intent of this bill, but an example of the unintended consequences created when bills are drafted without an understanding of the practical application of its language or the input of impacted local agencies.

Expands Legal Liability for Public Agencies and their Workforce

In addition to applying the IPA to local agencies, the bill would revise the law in several ways that will expose agencies and their workforce to new legal liabilities,

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

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

Ignores and Conflicts with Existing Privacy and Confidentiality Laws

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

Health

- The Health Insurance Portability and Accountability Act (HIPAA) and the Confidentiality of Medical Information Act (CMIA) regarding Medi-Cal beneficiaries and those receiving care at public hospitals;
- 42 CFR Part 2 for confidentiality of substance use disorder patient records;
- Welfare and Institutions Code (WIC) § 5325.1 regarding the right to privacy for persons receiving treatment for a mental illness;
- WIC § 827 regarding the right to privacy for juvenile records; and
- Penal Code § 13823.5(c)(2) regarding confidentiality of sexual assault examination records.

Social Services

- WIC § 10850 *et seq.* regarding confidentiality of applications and records related to public social services;

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

Elections

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

Schools

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

Criminal Justice

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

Finance

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

Public Utilities

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

Libraries

- Gov. Code § 7927.105 for confidentiality of registration and circulation records of library users; and

- Welfare and Institutions Code §§ 10850 and 14100.2 for confidentiality of records and data sharing of personal identifying information.

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

Put simply, local agencies take data privacy and confidentiality seriously and comply with a network of specific privacy and confidentiality laws. AB 1337 upends this longstanding framework with a blanket policy that directly conflicts with many existing laws or creates confusion and inconsistent compliance based on how agencies are used to compliance. While the California Consumer Privacy Act expressly provides that its requirements do not apply to information governed by CMIA, AB 1337 provides only a limited acknowledgement of its conflicts with CMIA.

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

To cite another conflict, HIPAA allows covered entities to disclose protected health information without an individual's consent for purposes including treatment, payment, or health care operations[2]. AB 1337 ignores these carefully designed rules and imposes significant uncertainty as to how patient data can be shared for delivery of medical care by public hospital systems.

County child welfare and behavioral services laws restrict even acknowledging whether an individual is receiving care, unless an entity is specifically authorized by law[3]. AB 1337 establishes contrary rules that endanger child privacy by allowing for the release of information upon consent and by other circumstances established in Civil Code § 1798.24.

[2] 5 C.F.R. § 164.502(a)(1)
[3] California Welfare & Institutions Code § 827 et seq. (child welfare); 42 C.F.R. Part 2 (behavioral health); Lanterman-Petris-Short Act (behavioral health).

Endangers Federal Funding

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

Imposes Expensive and Sudden Requirements on Local Agencies

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

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

Even though section 32 of the bill asserts that no reimbursement is required by the act, we believe the bill clearly mandates considerable new obligations for local agencies: compliance with the IPA, which requires significant changes to software, internal practices, and duties of local agency workforces.

To add to these challenges, the bill allows state and local agencies little time to prepare for compliance. Because the bill would take effect January 1, 2028, and because state and local agencies may not know if the bill will become law until the Governor's September 30, 2026, deadline to sign or veto bills, state and local agencies could have a little more than a year to prepare for compliance with the amended IPA. Agencies would be compelled to rapidly complete legal review, train staff, update forms, and implement new procedures for data management without any financial resources and in the midst of the dramatic workload changes that are anticipated with implementation of H.R. 1.

Heightens fiscal pressure on public agencies

Public agencies are facing considerable cost pressure from all fronts and AB 1337 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing statutory protections for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment, growing special education program demands and health care costs. For counties, implementation of H.R. 1. is expected to result in up to $9.5 billion in new annual costs to counties once fully implemented as it fundamentally shifts certain administrative fiscal responsibilities for safety net programs to counties. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million-dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

Put simply, we do not believe the costs, burden, and risks brought by this bill are necessary for public agencies.

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

Sincerely,

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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
Christian Kurpiewski, Chief Consultant, Senate Committee on Privacy, Digital Technologies, and Consumer Protection

June 3, 2026

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

RE: Assembly Bill 1439 (Garcia) Public retirement systems: development projects: labor standards.
As amended June 2, 2026 – OPPOSE
To be heard in the Senate Committee on Labor, Public Employment and Retirement on June 10, 2026

Dear Chair Smallwood-Cuevas,

The California State Association of Counties (CSAC), California Special Districts Association (CSDA), Rural County Representatives of California (RCRC), Urban Counties of California (UCC), League of California Cities (CalCities), California Association of School Business Officials (CASBO), and the Association of California School Administrators (ACSA) must respectfully oppose Assembly Bill 1439 (Garcia). AB 1439 would needlessly consume resources of CalPERS and CalSTRS and intrudes on the plenary authority of the governing boards of those systems.

This bill would require the boards of CalPERS and CalSTRS to contract with the University of California, Berkeley, Labor Center to study the impacts of the labor standard policies that would have been imposed on investments under the prior version of AB 1439. Our coalition opposed the bill in that form because it could have substantially limited investment options for CalSTRS, CalPERS and county retirement systems.

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 a step down a slippery slope of political interference in the retirement assets earned by California's public employees.

Aside from our concerns that the bill advances an unwise legislative proposal, we do not believe it is necessary. CalPERS is conducting a market study to evaluate the potential impacts of adopting the standards that had been proposed in AB 1439. It is not clear that there is an entity better positioned to conduct a study than the pension systems themselves: professional investment staff governed by a board accountable to public employees and employers. Requiring a duplicative analysis to be conducted by an outside entity, like the UC Labor Centers, undermines CalPERS' and CalSTRS' independence and authority to assess investment risks on behalf of their members.

The standards for investment outlined in AB 1439 would have established a *de facto* divestment mechanism for a broad swath of public pension investments. According to a CalPERS publication entitled Divestment is Political, CalPERS' Fiduciary Duty Is Not found that forced divestments substantially limit investment options for CalPERS and county retirement systems, ultimately raising annual contributions costs for public employers, including the state, local agencies, and schools, as well as the public workforce.

Divestment makes achieving the returns needed to maintain a plan's health more challenging; it 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. For these and other reasons, we have significant concerns with legislation that mandates divestment or, in this case, consumes time and resources to study investment restrictions motivated by political objectives of non-public employee advocates.

California's public workforce deserves the retirement benefits they have been promised. Legislative-imposed policies that limit pension fund investments not only risk future benefits, but they heighten pension costs for the public workforce, public employers, and taxpayers. We do not believe this legislation is an appropriate exercise of legislative authority or pensions system resources.

For these reasons, our organizations must respectfully oppose AB 1439. Please contact us if you have any questions.

Sincerely,

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CC: The Honorable Robert Garcia, California State Assembly
Members, Senate Committee on Labor, Public Employment and Retirement
Glenn Miles, Principal Consultant, Senate Committee on Labor, Public Employment and Retirement
Scott Seekatz, Policy Consultant, Senate Republican Caucus

FLOOR ALERT

County Welfare Directors Association of California

AB 2201 (Boerner) – Protecting Medi-Cal Coverage for Californians Act
Request for Aye Vote
File Item: 413

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 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.

We respectfully request your Aye vote on AB 2201.

URBAN COUNTIES
OF CALIFORNIA

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

June 2, 2026

The Honorable Jesse Arreguin, Chair
Senate Housing Committee
1021 O Street, Room 6710
Sacramento, CA 95814

RE: AB 2320 (Ta) Multifamily Housing Program: Homekey: adaptive reuse
As introduced on February 19, 2026 – SUPPORT

Dear Chair Arreguin:

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.

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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, Senate Housing Committee

June 3, 2026

To: The Honorable Monique Limón
President pro Tempore, California Senate

The Honorable Robert Rivas
Speaker, California State Assembly

The Honorable John Laird
Chair, Senate Budget and Fiscal Review Committee

The Honorable Jesse Gabriel
Chair, Assembly Budget Committee

RE: Maintaining Coverage for Vulnerable Californians: Alternative to Indigent Care Funding – Adopt Assembly Budget Plan

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), County Health Executives Association of California (CHEAC), County Welfare Directors Association of California (CWDA), County Behavioral Health Directors Association of California (CBHDA), the Service Employees International Union-California (SEIU California), California Black Health Network (CBHN), and the National Health Law Program (NHeLP) write to request the Legislature adopt the Assembly's budget plan to create a state funded, emergency-only benefit for individuals denied Medi-Cal due to work requirements.

California has been a national leader in reducing the uninsured rate and expanding access to care following implementation of the Affordable Care Act. However, provisions in H.R. 1 threaten

to reverse this progress. These changes put coverage at risk for more than one million Californians and will significantly increase the number of individuals who may turn to county indigent care programs which lack the resources to absorb this demand.

Counties serve as providers of last resort, delivering basic, often time-limited, medical care under their indigent care obligations. As Medi-Cal and Covered California expanded coverage, the state enacted AB 85 (Chapter 24, Statutes of 2013), which reduced available 1991 health realignment funding by slowing revenue growth and redirecting substantial funding to offset General Fund costs. As a result, counties do not have the financial capacity to respond to a large-scale shift of newly uninsured residents without additional support.

As an alternative to the state funding county costs to provide indigent care to those losing Medi-Cal coverage due to H.R. 1 community engagement requirements, we respectfully request that the Legislature adopt the Assembly's budget plan to establish a limited, emergency-only Medi-Cal benefit for two years. Consumer and labor advocates signing on do so with the clear understanding that their support does not undermine their recommendations to also oppose Medi-Cal cuts and the UIS and/or humanitarian-related budget recommendations/actions that other statewide coalitions have put forward.

This approach to provide state funded, emergency only Medi-Cal would:

- Ensure access to critical, life-saving care and stabilization services.
- Keeps people connected to the county eligibility systems allowing for more streamlined transition back to full scope Medi-Cal should ACA expansion individuals come back into HR.1 compliance.
- Prevent individuals from becoming fully uninsured and immediately shifting into unprepared county indigent care systems.
- Allow the state to more easily access allowed federal funding when individuals are admitted for in-patient emergency services, which provides an exemption from H.R. 1 work requirements.
- Provide the State with a two-year stabilization period to assess the real-world impacts of H.R. 1 and develop longer-term policy solutions.

Rather than allowing individuals to "fall off" Medi-Cal entirely, this limited benefit would maintain a basic coverage floor while avoiding the costly and complex need to rebuild indigent care infrastructure.

Sincerely,

Brendan McCarthy, Sr. 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)

Michelle Doty Cabrera, Executive Director
County Behavioral Health Directors Association of California (CBHDA)

Carlos Marquez, III, Executive Director
County Welfare Directors Association of California (CWDA)

Beth Malinowski
Government Relations Advocate
SEIU California

Rhonda Smith
Executive Director
California Black Health Network

Kim Lewis
Director of California Policy
National Health Law Program

cc: Honorable Members, Senate Budget and Fiscal Review Committee
Honorable Members, Assembly Budget Committee
Joe Stephenshaw, Director, California Department of Finance
Kim Johnson, Secretary, California Health and Human Services Agency
Michelle Baass, Director, California Department of Health Care Services
Erica Pan, Director and State Public Health Officer, California Department of Public Health
Richard Figueroa, Office of Governor Gavin Newsom
Paula Villescaz, Office of Governor Gavin Newsom
Marjorie Swartz, Office of the Senate President pro Tempore
Rosielyn Pulmano, Office of the Assembly Speaker
Elisa Wynne, Senate Budget & Fiscal Review Committee
Scott Ogus, Senate Budget & Fiscal Review Committee
Christian Griffith, Assembly Budget Committee
Patrick Le, Assembly Budget Committee
Kirk Feely, Senate Republican Caucus
Anthony Archie, Senate Republican Caucus
Joe Shinstock, Assembly Republican Caucus
Eric Dietz, Assembly Republican Caucus
Jason Constantouros, Legislative Analyst's Office
Will Owen, Legislative Analyst's Office

June 2, 2026

The Honorable Matt Haney
Chair, Assembly Housing and Community Development Committee
1021 O Street, Suite 5740
Sacramento, CA 95814

Re: **SB 802 (Ashby): Housing finance and development: Sacramento Area Housing and Homelessness Agency**
As amended 6/1/26 – OPPOSE
Set for hearing 6/10/26 – Assembly Housing and Community Development Committee

Dear Assembly Member Haney:

On behalf of the Urban Counties of California (UCC) and the California State Association of Counties (CSAC), we write in respectful opposition to Senate Bill 802, Senator Angelique Ashby's measure that would consolidate regional housing and homelessness programs and redirect local agencies' funding for purposes of providing regional housing and homelessness services. This measure, regrettably, bypasses local decision-making for purposes of consolidating local resources without ensuring equitable, effective, and timely allocation of such resources to the contributing entities; further, we believe that this concept sets a new and troubling precedent for legislating local collaboration without a specific request from participating entities. Counties – including the County of Sacramento – are capable of participating in collaborative discussions with their local city and Continuum of Care (CoC) colleagues and their duly elected boards of supervisors are directly accountable to their constituents without the need for additional directives from the Legislature.

SB 802 dramatically restructures governance, funding, and program delivery in the County with a subset of the cities therein in a manner that will likely be disruptive to existing efforts on affordable housing and homelessness programs. Transferring coordinated entry system responsibilities to the new agency, which are required of the Continuum of Care under federal regulations, introduces significant uncertainty for how the County and affected cities will carry out homelessness response in compliance with federal law under SB 802. Existing contractual agreements with the State of California would potentially be put at risk for those programs for which the County and City of Sacramento receive direct allocations of funding that SB 802 would require to be transferred to the new agency. This further undermines program delivery by removing the opportunity to consolidate resources from multiple funding sources, including those not available to the new agency. The ability to leverage funding from a variety of sources is often what allows these types of projects and programs to come to fruition.

SB 802 also takes the unprecedented step of requiring the redirection of locally imposed fees that have been enacted and collected by the County and City of Sacramento in a manner that undermines the connection between locally enacted fees and the services provided by that local entity. This language would also give authority over these funds to a regional entity that would be

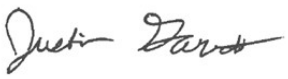
super-majority controlled by the representatives of *other* jurisdictions. For instance, in-lieu affordable housing fees generated in unincorporated Sacramento County would be subject to the control of a nine-member Board that only includes three supervisors. We believe this concept potentially violates constitutional requirements for locally imposed fees, as well as the municipal powers of charter jurisdictions. These provisions alone are indicative of the challenges that SB 802 would pose in the region.

Recent amendments that subject some jurisdictions' revenue to expenditure by the new agency while others' remain with their governing body suggest that the goal of SB 802 – to streamline and advance countywide housing and homelessness programs – is a complex one that requires mutual trust and understanding of such goals, a commitment to work in partnership, and creative expertise to maximize community impact. If the new amendments suggest a lack of interest in investing in such strategies by some entities, the goal of the bill is undermined. Further, if such parties then are able to direct resources that were provided to other jurisdictions, the bill reflects a fundamental unfairness to participating entities and the communities they serve.

Counties are deeply engaged in collaborative efforts with their city partners, the nonprofit sector, and philanthropic organizations to do all we can to assist those who experience homelessness in their communities. Measures like SB 802 should only be considered at the request of local jurisdictions and after extensive conversations among stakeholders that establish the purpose, governance, and funding of such a model. As a result, we are respectfully opposed to SB 802.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California



Justin Garrett
Senior Legislative Advocate
California State Association of Counties

cc: Members and Consultants, Assembly Housing and Community Development Committee
The Honorable Angelique Ashby, California State Senate
Sacramento County Board of Supervisors

June 2, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended May 14, 2026)*

Dear Chair Ortega:

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, Public Risk Innovation, Solutions, and Management, California Association of Recreation and Park Districts, and California County Superintendents 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 ways 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 notable and costly steps backwards from the enrolled version of SB 7, directly

implicating the concerns raised by the Governor. Specifically, 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 whenever an ADS output is primarily relied on to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. Increasing the burdens of compliance will deter local governments from using these important 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 as well as Proposition 98 dollars intended for students and classrooms.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For schools, this is a direct drain on Prop 98 funding. 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, and schools facing declining enrollment, now is not the time for additional unfunded mandates, particularly without a clearly demonstrated need.

Further, 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.

Applying SB 947 to Public Employers May Lead to Unintended Consequences
Local governments and local 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 these 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 primarily relied on 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. Ensuring compliance with 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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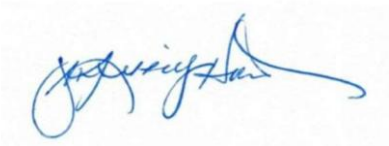

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Brianna Bruns
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CC:

The Honorable Jerry McNerney
Honorable Members, Assembly Labor and Employment Committee
Erin Hickey, Principal Consultant, Assembly Labor and Employment Committee
Tess Scherkenback, Consultant, Assembly Republican Caucus

June 3, 2026

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

RE: Senate Bill 951 (Reyes) – OPPOSE UNLESS AMENDED
As Amended May 14, 2026

Dear Assemblymember Ortega:

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), Public Risk Innovations, Solutions, and Management (PRISM), University of California, California Association of Recreation and Parks Districts (CARPD) and Association of California Healthcare Districts (ACHD) we must regretfully oppose Senate Bill 951 (Reyes), regarding workforce displacement or termination due to the adoption of certain technologies, unless amended to exempt local government employers.

SB 951 would establish the California Worker Technological Displacement Act, and require employers to provide at least a 60-day advanced written notice before any reduction in hours or termination caused in whole by the use of artificial intelligence (AI) or other automated technology (undefined). For employers of 100 or more employees, it would establish “first bid” rights on other positions for terminated employees. Compliance failure would cause 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. SB 951 would also subject public agencies to a $500 fine for each day of a violation and would allow any interested or uninterested party to file a report of compliance failure with the Labor Commissioner. Compounding these concerns, the bill's definition of "worker" includes independent contractors, meaning cities, counties, and special districts

would have to provide back pay and other benefits to employees of a private company 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 technology 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, our organizations have concerns regarding the likelihood of overlapping or conflicting requirements introduced by this bill that will create uncertainty and liability for local agencies.

Furthermore, SB 951's requirement that certain employers, including many public agencies, provide displaced workers with a "right of first bid" on other positions would directly conflict with long-established merit-based civil service systems and collectively bargained labor agreements that govern vast majority public-sector hiring. These systems prescribe detailed procedures for filling vacancies, including competitive examinations, minimum qualifications, seniority provisions, reemployment lists, promotional opportunities, and negotiated bumping and layoff rights. By creating a new statutory hiring preference that supersedes these established processes, SB 951 would create significant legal uncertainty and expose public employers to competing obligations under state labor laws, civil service rules, and local personnel ordinances.

While the recent amendments attempt to address collective bargaining concerns by exempting situations where the right-of-first-bid provisions would conflict with a collective bargaining agreement, the amendment does not resolve the fundamental problems created by the bill. Instead, it introduces significant legal uncertainty by requiring employers, employee organizations, and ultimately the courts to determine when a conflict exists and whether a particular negotiated provision is sufficient to displace the statutory requirements. By establishing statutory rights governing layoffs, displacement, and reemployment, SB 951 effectively removes or constrains subjects that have

traditionally been negotiated through collective bargaining. Rather than preserving local labor-management flexibility, the bill imposes a one-size-fits-all framework that may conflict with existing agreements, complicate future negotiations, and undermine carefully balanced personnel systems developed over decades through collective bargaining and civil service laws.

Finally, for employees supported by federal grant funding, including those administering critical health and human services programs, SB 951 may conflict with federal merit-system requirements that are conditions of receiving federal funds. Any erosion of merit-based hiring standards could place public agencies at risk of audit findings, compliance violations, or jeopardized federal funding streams. At a time when local governments are already facing significant fiscal and workforce challenges, SB 951 would create administrative burdens, increase litigation risk, and disrupt established personnel systems without providing clear guidance on how employers are expected to reconcile these conflicting legal obligations.

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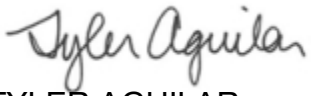


TYLER AGUILAR
Legislative Director, Business Operations
State Government Relations
University of California
tyler.aguilar@ucop.edu

ETHAN NAGLER
Legislative Representative
California Association of Recreation and
Park Districts
enagler@publicpolicygroup.com

JASON SCHMELZER
Legislative Advocate
Public Risk Innovation,
Solutions, and Management (PRISM)
jason@syaslpartners.com

cc: The Honorable Eloise Gomez Reyes, Member of the California State Senate
Members of the Assembly Labor and Employment Committee
Megan Lane, Chief Consultant, Assembly Labor and Employment Committee
Tess Scherkenback, Consultant, Assembly Republican Caucus

ASSEMBLY FLOOR ALERT

Assembly Bill 1821 (Pacheo) California Public Records Act: Agency Response Time

[As Amended April 6, 2026]

SUPPORT

Our coalition requests your **AYE vote** on **AB 1821 (Pacheo).**

- AB 1821 updates California Public Records Act (CPRA) timelines by converting response periods from calendar days to business days, aligning deadlines with actual agency working days instead of weekends and holidays.
- Current law requires a determination within 10 days, with a possible 14-day extension, but does not reflect operational realities; this change allows agencies the full intended time, improving compliance.
- Local agencies have faced a 73% increase in requests over five years, with over 90% reporting diversion of staff from core services, while managing increasingly complex records requiring careful review of sensitive information.
- At the same time, agencies have lost key revenue sources that once offset these costs: Proposition 42 eliminated state reimbursement, and a 2020 California Supreme Court ruling restricted cost recovery, leaving local governments to absorb the full cost of increasingly time-intensive requests.
- AB 1821 is a modest, common-sense fix that supports transparency while improving consistency and effective implementation of the CPRA.

For these reasons, we respectfully
request your "YES" vote on **AB 1821.**

May 26, 2026

The Honorable Dr. Joaquin Arambula
California State Assembly
1021 O Street, Suite 6130
Sacramento, CA 95814

RE: Assembly Bill 2605 (Arambula) – REMOVAL OF OPPOSITION
As Amended May 18, 2026

Dear Assemblymember Arambula:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Urban Counties of California (UCC), we write to remove our opposition to your measure, Assembly Bill 2605, as amended on May 18, 2026. The amendments ensure that should the bill be signed into law, the provisions only become operative upon a full and ongoing state appropriation to fund implementation. Thank you for your acknowledgement of county fiscal concerns and appreciate your continued support for the provision of indigent defense. If you 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

RCRC
RURAL COUNTY REPRESENTATIVES OF CALIFORNIA

URBAN COUNTIES OF CALIFORNIA

May 26, 2026

The Honorable Sharon Quirk-Silva
Chair, Assembly Budget Subcommittee 5
on State Administration
1021 O Street, Room 8230
Sacramento, CA 95814

The Honorable Melissa Hurtado
Chair, Senate Budget and Fiscal Review
Subcommittee 4 on State Administration
and General Government
1020 N Street, Room 502
Sacramento, CA 95814

RE: Development Impact Fee Trailer Bill – CONCERNS

Dear Assemblymember Quirk-Silva and Senator Hurtado,

On behalf of the Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC) we write to share our significant concerns with the Governor's proposed trailer bill concerning development impact fees and other charges that are lawfully imposed by local governments on development projects. While impact fees are too often mischaracterized as a revenue generation tool for local governments, these fees are subject to strict constitutional and statutory limitations which ensure that the fees are applied uniformly to proposed development projects and are narrowly tailored to offset the costs of public infrastructure necessary to support development projects. In the case of residential developments, impact fees support needed infrastructure improvements that directly benefit the future residents of new homes.

There is a precedent for treating the deferral or waiver of impact fees as local government matching funds for competitive housing programs, including the Low Income Housing Tax Credit Program, however, we are concerned that the trailer bill will systematically disadvantage local governments that cannot afford to offset impact fees when sponsoring or co-sponsoring affordable housing project applications. We also have technical concerns that the trailer bill broadly mischaracterizes a variety of taxes, fees, and charges as "impact fees," impractically requires the waiver of Mello Roos-related special taxes, and is duplicative of existing law as to the applicability of in-lieu affordable housing fees to affordable housing projects.

Fee Waiver Requirement for Local Government Applicants/Co-Applicants

We are most concerned with the unintended impacts of proposed Health and Safety Code Section 51061. Local governments cannot arbitrarily waive generally applicable development impacts fees for projects where they are applicants or co-applicants for state

affordable housing funding. Under the framework proposed by the trailer bill and in compliance with existing law, counties would be required to backfill any waived fees imposed on such a project. From a practical perspective, this will often result in a substitution of one form of subsidy (the impact fee waiver) for other local government matching funds in support of a high-priority project, providing no net fiscal benefit for the project. For local governments where infrastructure needs to support new housing are particularly acute, including the unincorporated areas of many counties, or which lack the fiscal capacity to provide such a substantial subsidy for a project, the trailer bill could limit or disincentivize applications for sorely needed affordable housing projects. We fear that this provision will be most burdensome in disadvantaged communities with weak real estate markets, limited existing urban infrastructure, and the greatest need for state investment in affordable housing. We encourage the Legislature to strike this section.

Trailer Bill Inappropriately Applies to Non-Impact Fee Charges

The broad applicability of the trailer bill's provisions to local taxes, fees, and charges on residential development projects creates both policy concerns and a need for definitional clarity. In the case of special taxes imposed pursuant to the Mello-Roos Community Facilities Act, the waiver or reduction of the tax is impractical or impossible due to the ongoing nature of these charges and the fact that such taxes can support both one-time infrastructure improvements, as well as the maintenance and operation of both facilities and local government services. This limitation is particularly unworkable when an affordable housing project is being constructed within an existing community facilities district. Furthermore, sometimes impact fees and Mello-Roos fees are collected to back debt service on a locally issued general obligation financing bond. At minimum, the trailer bill's language must exempt monies pledged to debt service as it is legally impossible to waive those assessments.

For in-lieu affordable housing fees, it is unclear why an affordable housing project would be subject to such a fee and why this provision of the bill is necessary. Recent legislation removed any doubt on this point (Chapter 346, Statutes of 2021).

Finally, for definitional clarity and to avoid confusion as to the statutory authorization for each type of tax, fee, or charge, the bill should use terminology that accurately describes the various items to which it applies to rather than mischaracterizing each of them as "development impact fees."

In conclusion, counties recognize the need for all levels of government to work together to advance affordable housing projects in a cost-effective and efficient manner. We do not object to including incentives for fee waivers and deferrals in competitive state affordable housing programs but encourage the Legislature to do so carefully and in a manner that does not have unintended consequences, particularly the limitation of applications from communities with the greatest need for affordable housing development and supporting infrastructure improvements.

Thank you for your consideration of our concerns. Please contact us with any questions about our position.

Sincerely,

TRACY RHINE
RCRC
Senior Policy Advocate
trhine@rcrcnet.com

CHRISTOPHER LEE
UCC
Legislative Advocate
clee@politicogroup.com

cc: Members of the Senate Budget and Fiscal Review Subcommittee 4
Members of the Assembly Budget Subcommittee 5
Genevieve Morelos, Consultant, Assembly Budget Subcommittee No. 5
Timothy Griffiths, Consultant, Senate Budget Subcommittee No. 4
Joanne Roy, Consultant, Senate Budget and Fiscal Review Committee
Katie Kolitsos, Consultant, Office of Assembly Speaker Rivas
Nicole Restmeyer, Consultant, Office of President pro Tempore Limón
Jimmy McDonald, Consultant, Assembly Local Government Committee
Anton Favorini-Csorba, Chief Consultant, Senate Local Government Committee
Myles White, Deputy Legislative Secretary, Office of Governor Newsom
Tyrone Buckley, Deputy Director of Legislation, Department of Housing and Community Development

May 29, 2026

The Honorable Aisha Wahab
California State Senate
1021 O Street, Suite 8530
Sacramento, CA 95814

Re: **SB 1193 (Wahab): Discretionary funds: County of Alameda**
As amended 4/30/26 – OPPOSE
Awaiting hearing – Assembly Local Government Committee

Dear Senator Wahab:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Counties (CSAC), we write to express our opposition to your Senate Bill 1193, which place limitations on the use of certain county funds by the Alameda County Board of Supervisors. Even though SB 1193 explicitly applies to the County of Alameda, we are concerned about the precedent-setting nature of the measure.

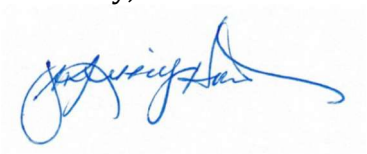
Unlike Assembly Bill 2946 (Valencia, 2024), which was approved after an Orange County supervisor – now incarcerated in a federal facility – participated in illegal activities regarding the expenditure of district-specific discretionary funds, SB 1193 imposes broad, substantial, and burdensome requirements on the Alameda County Board of Supervisors based on findings in a nearly ten-year-old grand jury report, which were expressly disputed by the County. AB 2946 was narrowly crafted to address the Orange County concern, but SB 1193 goes significantly further by expanding the definition of discretionary funds, requiring additional justifications for certain expenditures, and imposing limitations on supervisors' basic authority to appropriate funds.

To our knowledge, no currently seated Alameda County supervisor has been accused of illegal activities associated with their fiscal responsibilities to the County. No family members or close friends of the supervisors have been investigated for misuse of public funds and there is no known financial scandal with any local nonprofits. In fact, Alameda County has maintained superior bond ratings from the major rating agencies, indicating high credit quality and low risk. At the same time, the County continues to provide state-

mandated safety net services, countywide services to all county residents, and municipal services in the unincorporated area. Accordingly, we fail to understand the justification for this measure.

Regrettably, SB 1193 sets an alarming precedent that undermines the ability of the duly elected board of supervisors to appropriate county resources as it sees fit. To be clear, this fiduciary obligation lies solely with the Board of Supervisors, whose members are directly accountable to county voters. As a result, we must oppose SB 1193.

Sincerely,



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

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

cc: The Honorable Juan Carrillo, Chair, Assembly Local Government Committee
Members and Consultants, Assembly Local Government Committee
Alameda County Board of Supervisors

May 18, 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: Maintaining Coverage for Vulnerable Californians: Alternative to Indigent Care Funding

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), County Health Executives Association of California (CHEAC), County Welfare Directors Association of California (CWDA), and County Behavioral Health Directors Association of California (CBHDA) write to request your leadership and partnership in addressing anticipated coverage losses resulting from federal work requirements and their impact on Medi-Cal eligible populations and county indigent care programs.

California has been a national leader in reducing the uninsured rate and expanding access to care following implementation of the Affordable Care Act. However, provisions in H.R. 1 threaten to reverse this progress. These changes put coverage at risk for more than one million Californians and will significantly increase the number of individuals who may turn to county indigent care programs which lack the resources to absorb this demand.

Counties serve as providers of last resort, delivering basic, often time-limited, medical care under their indigent care obligations. As Medi-Cal and Covered California expanded coverage, the state enacted AB 85 (Chapter 24, Statutes of 2013), which reduced available 1991 health realignment funding by slowing revenue growth and redirecting substantial funding to offset General Fund

costs. As a result, counties do not have the financial capacity to respond to a large-scale shift of newly uninsured residents without additional support.

Counties have developed a comprehensive budget request to address the impact of H.R. 1 – including the need for funding for indigent care programs, county eligibility workload associated with changes to Medi-Cal and CalFresh, impacts of H.R. 1 on public hospital finances, and impacts on county behavioral health programs from people losing Medi-Cal coverage. Due to increased demand for county indigent care services under H.R. 1, counties have requested state funding of $761 million in 2026-27 and $2.4 billion in 2027-28 to rebuild the infrastructure and deliver indigent care services.

Recognizing the significant fiscal challenges facing the state and the difficult decisions before the Legislature, we acknowledge that alternative approaches to preserving access to care may need to be considered.

As an alternative to the state funding county costs to provide indigent care to those losing Medi-Cal coverage due to H.R. 1 community engagement requirements, we recommend the state establish a limited, emergency-only Medi-Cal benefit for two years. We estimate the benefit cost of this approach to be up to $40 million in 2026-27 and $415 million in 2027-28 and the county administrative cost to be $10 million in 2026-27 and $48 million in 2027-28.

This approach would:

- Ensure access to critical, life-saving care and stabilization services
- Prevent individuals from becoming fully uninsured and immediately shifting into unprepared county indigent care systems
- Allow the state to more easily access allowed federal funding when individuals are admitted for in-patient emergency services, which provides an exemption from H.R. 1 work requirements.
- Provide the State with a two-year stabilization period to assess the real-world impacts of H.R. 1 and develop longer-term policy solutions

Rather than allowing individuals to “fall off” Medi-Cal entirely, this limited benefit would maintain a basic coverage floor while avoiding the costly and complex need to rebuild indigent care infrastructure.

Our shared north star remains full-scope coverage for all Californians. Counties would strongly support any expansion beyond emergency-only services as resources allow.

Thank you for your leadership and partnership as we work together to identify pragmatic, fiscally responsible solutions that preserve access to care and maintain coverage for California’s most vulnerable residents.

Sincerely,

As signed by

Brendan McCarthy, Sr. Legislative Advocate
California State Association of Counties (CSAC)

As signed by

Kelly Brooks-Lindsey, Legislative Advocate
Urban Counties of California (UCC)

As signed by

Sarah Dukett, Policy Advocate
Rural County Representatives of California (RCRC)

As signed by

Katie Rodriguez, Interim President & CEO
California Association of Public Hospitals and Health Systems (CAPH)

As signed by

Kari Brownstein, Executive Director
County Medical Services Program (CMSP)

As signed by

Michelle Gibbons, Executive Director
County Health Executives Association of California (CHEAC)

As signed by

Michelle Doty Cabrera, Executive Director
County Behavioral Health Directors Association of California (CBHDA)

As signed by

Carlos Marquez, III, Executive Director
County Welfare Directors Association of California (CWDA)

cc: Honorable Members, Assembly Budget Committee
Joe Stephenshaw, Director, California Department of Finance
Kim Johnson, Secretary, California Health and Human Services Agency
Michelle Baass, Director, California Department of Health Care Services
Erica Pan, Director and State Public Health Officer, California Department of Public Health
Richard Figueroa, Office of Governor Gavin Newsom
Paula Villescaz, Office of Governor Gavin Newsom
Rosielyn Pulmano, Office of the Assembly Speaker
Christian Griffith, Assembly Budget Committee
Patrick Le, Assembly Budget Committee
Joe Shinstock, Assembly Republican Caucus
Eric Dietz, Assembly Republican Caucus
Jason Constantouros, Legislative Analyst's Office

May 18, 2026

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Chair, Assembly Budget Committee
1021 O Street, Suite 8230
Sacramento, CA 95814

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1021 O Street, Room 4120
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California State Association of Counties (CSAC)

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Urban Counties of California (UCC)

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Rural County Representatives of California (RCRC)

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Joe Shinstock, Assembly Republican Caucus
Eric Dietz, Assembly Republican Caucus
Jason Constantouros, Legislative Analyst's Office

May 18, 2026

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

The Honorable Caroline Menjivar
Chair, Senate Budget & Fiscal Review Subcommittee No. 3
1021 O Street, Room 6630
Sacramento, CA 95814

RE: Maintaining Coverage for Vulnerable Californians: Alternative to Indigent Care Funding

Dear Senator Laird and Senator Menjivar,

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As signed by

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Urban Counties of California (UCC)

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Elisa Wynne, Senate Budget & Fiscal Review Committee
Scott Ogus, Senate Budget & Fiscal Review Committee
Kirk Feely, Senate Republican Caucus
Anthony Archie, Senate Republican Caucus
Jason Constantouros, Legislative Analyst's Office

May 18, 2026

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Joe Stephenshaw, Director, California Department of Finance
Kim Johnson, Secretary, California Health and Human Services Agency
Michelle Baass, Director, California Department of Health Care Services
Erica Pan, Director and State Public Health Officer, California Department of Public Health
Richard Figueroa, Office of Governor Gavin Newsom
Paula Villescaz, Office of Governor Gavin Newsom
Marjorie Swartz, Office of the Senate President pro Tempore
Elisa Wynne, Senate Budget & Fiscal Review Committee
Scott Ogus, Senate Budget & Fiscal Review Committee
Kirk Feely, Senate Republican Caucus
Anthony Archie, Senate Republican Caucus
Jason Constantouros, Legislative Analyst's Office

May 12, 2026

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

Re: **AB 2064 (Sharp-Collins): Discrimination: criminal history.**
As amended April 9, 2026 – OPPOSE

Dear Chair Wicks,

On behalf of the California Special Districts Association (CSDA), California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), and the Association of California School Administrators (ACSA), we write in respectful opposition to Assembly Bill (AB) 2064 (Sharp-Collins), which would add criminal history as a protected characteristic under the Unruh Civil Rights Act (UCRA) and the Fair Employment and Housing Act (FEHA).

The sponsors of AB 2064 have not made public employers aware of examples where existing law is not working to protect applicants in their workplaces. Despite the lack of demonstrated need for this bill in the public sector, AB 2064 would severely interfere with public agencies' obligations to provide safe workplaces for employees and the public, including vulnerable populations, while exposing well-intentioned public agencies to significant litigation risk.

Public Agencies Are Different

While we appreciate the concerns underlying this measure, the proposed solution of creating a new protected characteristic under FEHA, in particular, fails to account for the unique aspects of public employment and responsibilities of public agencies. Public agencies are implementing the requirements of Senate Bill 553 (Cortese, 2023), which includes obligations aimed at preventing workplace violence and harassment, and ensuring workplace safety. Public agencies maintain critical infrastructure, jails, fire and police stations, hospitals, parks, libraries, and schools. Virtually all public employees are Disaster Service

Workers pursuant to Government Code Section 3101, and may be called upon to respond to emergencies. These roles and responsibilities often require public employees to work alone or with little support. Public employees must maintain operations, the failure of which could place entire communities in danger. Public employees' responsibilities place them in proximity to vulnerable populations such as patients, students and children, incarcerated individuals, people experiencing homelessness, victims of violence or disaster, and the elderly. Simply put, public agencies' responsibilities are too great, and the consequences of failure too dire, to add ambiguity, additional liability, and litigation risk to the performance of their core operations, without a demonstrated need.

AB 2064 Would Trade Clear Rules for Ambiguity, Exposing Well-Intentioned Public Agencies to Litigation

Robust frameworks under existing law provide clear rules of the road and ensure that applicants are given fair consideration and that criminal history background checks are conducted in a focused manner. Existing law, Government Code Section 12952, provides detailed requirements for employers to question or investigate an applicant's conviction history in connection with positions for which a conviction history background check is required by law, and for other positions. Public employers have not been provided with examples of this framework failing to work properly in their workplaces.

AB 2064 would create ambiguity and additional legal liability exposure by adding criminal history as a new protected characteristic under FEHA (and UCRA), with all of the attendant rights, duties, and remedies. Application of the full suite of FEHA protections to criminal history, on top of the existing framework under the Fair Chance Act, results in significant uncertainty regarding public agencies' legal obligations – and regarding their ability to continue effectively protecting the public and providing public services. Public employers will be exposed to litigation risk with multiple statutory frameworks that do not fully align, and the careful balance struck in the Fair Chance Act will be undermined. While AB 2064 attempts to partially correct for this by providing narrow exceptions in Section 5 of the bill, the exceptions only serve to highlight the risks posed by the measure.

Proposed Government Code Section 12940(s)(1) makes clear that the provisions of the part relating to discrimination on the basis of criminal history are *in addition* to those in Section 12952, reinforcing public agency concerns about ambiguity and potential liability under new frameworks.

The goals of this measure are laudable. However, the current framework provides significant protections to ensure that applicants for hiring and

promotion are given fair consideration while balancing the unique service delivery provided by public agencies. Given the lack of evidence that existing protections are insufficient in their workplaces, any potential benefits of this measure are outweighed by the risks and costs.

For these reasons, we are **opposed** to AB 2064 and urge your "NO" vote. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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CC:
The Honorable LaShae Sharp-Collins
Honorable Members, Assembly Appropriations Committee
Shiran Zohar, Principal Consultant, Assembly Appropriations Committee
Liz Enea, Consultant, Assembly Republican Caucus

May 12, 2026

The Honorable LaShae Sharp-Collins
California State Assembly
1021 O Street, Suite 4130
Sacramento, CA 95814

Re: **AB 2064 (Sharp-Collins): Discrimination: criminal history.**
As amended April 9, 2026 – OPPOSE

Dear Assembly Member Sharp-Collins,

On behalf of the California Special Districts Association (CSDA), California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), and the Association of California School Administrators (ACSA), we write in respectful opposition to Assembly Bill (AB) 2064 (Sharp-Collins), which would add criminal history as a protected characteristic under the Unruh Civil Rights Act (UCRA) and the Fair Employment and Housing Act (FEHA).

The sponsors of AB 2064 have not made public employers aware of examples where existing law is not working to protect applicants in their workplaces. Despite the lack of demonstrated need for this bill in the public sector, AB 2064 would severely interfere with public agencies' obligations to provide safe workplaces for employees and the public, including vulnerable populations, while exposing well-intentioned public agencies to significant litigation risk.

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The goals of this measure are laudable. However, the current framework provides significant protections to ensure that applicants for hiring and

promotion are given fair consideration while balancing the unique service delivery provided by public agencies. Given the lack of evidence that existing protections are insufficient in their workplaces, any potential benefits of this measure are outweighed by the risks and costs.

For these reasons, we are respectfully opposed to AB 2064. If you have any questions, please do not hesitate to contact our organizations' representatives directly.

Sincerely,

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May 12, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
State Capitol, Room 412
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 Appropriations Committee May 4, 2026

Dear Chair Cervantes,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), League of California Cities (CalCities), California Special Districts Association (CSDA), and the Association of California School Administrators (ACSA), 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 all California public agencies 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.

SB 1319 could cause California's pension systems to lose an investment opportunity that typically has an expected investment return above the discount rate. That would likely cause the systems to reduce their discount rate accordingly, causing direct cost increases for the state, all local agencies and schools, and public employees. These costs could easily reach billions for public agencies.

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

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

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.

Enhances pressure on public agencies

Public agencies are facing considerable cost pressure from all fronts and SB 1319 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multimillion dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

Sincerely,

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CC: The Honorable Maria Elena Durazo
Members, Senate Appropriations Committee
Bob Franzoia, Consultant, Senate Appropriations Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

May 5, 2026

The Honorable Buffy Wicks
Chair, Assembly Committee on Appropriations
1021 O Street, Suite 8220
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 Appropriations on May 6, 2026

Dear Chair Wicks,

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 develop or use artificial intelligence (AI) tools that can improve service delivery, increase government efficiency, and replace rote tasks with more meaningful work.

AB 2027 would impose immediate and significant costs on all public agencies in California. Every public agency, including every county, city, school district, special district, and state agency, would be required to conduct immediate compliance assessments over a three-month period before the bill takes effect. Because the bill refers to definitions in the California Consumer Privacy Act (CCPA), public agencies would have a rapid deadline to interpret a law that has never applied to them. Most critically, agencies would be required to cease training existing AI systems with the aid of the public workforce and could be compelled to cease efforts to procure, develop, or implement new technology.

In addition to direct costs, this bill could have profound indirect costs for public agencies, muting the benefits of technologies that are already helping to improve

service delivery for Californians and to amplify the ability of government agencies to protect the public. To name just one example, a county welfare office may be required to cease using tools that simplify public benefit enrollment, causing frustration by the public who needs access to social safety services and adding to further strain to an already strained system.

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.

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

Public agencies are not governed by the 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.

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;
- Perform road maintenance triage, detection of road hazards, and identification of potholes;
- Detect wildfires and earthquakes;
- Monitor dam safety;
- Detect leaks for water pipelines;
- Improve efficiency for public benefit enrollment and pupil attendance monitoring; 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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CC: The Honorable Chris Ward, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Irene Ho, Deputy Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

May 4, 2026

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

Re: **Assembly Bill 2545 (Schiavo). Report: labor force impact: artificial intelligence.**
As Amended April 14, 2026 - Support if Amended
To be heard in the Assembly Appropriations

Dear Chair Wicks

On behalf of the California State Association of Counties (CSAC) and Urban Counties of California (UCC), League of California Cities (Cal Cities), and the Association of California School Administrators (ACSA), 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.

We respectfully request that a local agency employer representative 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 and avoid potential future costs or unfunded mandates for local governments. While we have concerns regarding other legislation that is designed to limit, regulate, or prohibit new technologies in the workplace, AB 2545 takes better approach: evaluate the impacts of AI systems analytically before imposing new restrictions.

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
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Dorothy Johnson
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CC: The Honorable Pilar Schiavo, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Irene Ho, Deputy Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director Assembly Republican Caucus

May 4, 2026

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

Re: AB 2640 (Hadwick): Commission on State Mandates: state mandates.
As amended April 9, 2026 – SUPPORT
To be heard in Assembly Appropriations on May 6, 2026

Dear Chair Wicks:

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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CC: The Honorable Heather Hadwick, California State Assembly
Members and staff, Assembly Appropriations Committee
Jennifer Swenson, Principal Consultant, Assembly Appropriations Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus

May 4, 2026

The Honorable Buffy Wicks, Chair
Assembly Appropriations Committee
1021 O Street, Suite 8150
Sacramento, CA 95814

Re: AB 2656 (Petrie-Norris): Public Employees: notice: artificial intelligence performing service within the scope of work
As amended 4/14/26 – OPPOSE
Awaiting hearing – Assembly Appropriations Committee

Dear Assembly Member Wicks:

On behalf of the Urban Counties of California (UCC), the California Special Districts Association, the Rural County Representatives of California, the California State Association of Counties, the California Association of Recreation and Park Districts, Public Risk Innovation, Solutions, and Management (PRISM), the League of California Cities, and the Association of California School Administrators, 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. As a result, we seek amendments to clarify more precisely the language as to when notification is required.

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 unless it is amended to provide clarity and specificity as to when notification is to be provided. 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

Ethan Nagler
Legislative Representative
California Association of Recreation and Park Districts

Jason Schmelzer
Legislative Advocate
Public Risk Innovation, Solutions, and Management (PRISM)

Johnnie Pina
Legislative Affairs, Lobbyist
League of California Cities

Dorothy Johnson
Legislative Advocate
Association of California School Administrators

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

May 8, 2026

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

Re: SB 1329 (McNerney): Real property tax: valuation: active solar energy system.
As amended March 23, 2026 – OPPOSE
To be heard in Senate Appropriations on May 11, 2026

Dear Chair Cervantes:

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC), we write in respectful opposition to Senate Bill 1329 (McNerney), which would establish a new assessment process for certain solar energy systems for purposes of calculating property tax revenues owed to local schools, counties, cities, and special districts. While we appreciate that the solar industry acknowledges that its need for significant subsidy by local agencies no longer exists, this bill would significantly alter the valuation of active solar energy systems for property tax purposes, and we share many of the concerns outlined by the California Assessors' Association.

California's solar industry is thriving by anyone's measure. Regrettably, while the continued extension of the existing tax exclusion has clearly benefited solar investors, it has done so at the expense of local agencies – and, in many cases, those local agencies least able to afford it. Preliminary analysis indicates value reductions for these solar energy systems could exceed 40 percent, resulting in significantly less revenues for counties that would otherwise be used to support public safety, fire protection, libraries, parks, and essential health and human services.

With the passage of H.R. 1, we 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, reduces potential revenues, or that places additional workload pressures on counties.

We remain committed to continued dialogue with the author, the industry, and other stakeholders to ensure that assessments of solar energy systems fairly reflect their value and that local agencies, who have borne the burden of hosting such systems with little economic advantage, begin to benefit from the siting of such systems in their communities.

For these reasons, we are respectfully opposed to SB 1329. Should you have any questions regarding our position, please do not hesitate to contact us.

Sincerely,

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Jean Kinney Hurst
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CC: The Honorable Jerry McNerney, California State Senate
Members and staff, Senate Appropriations Committee
Robert Ingenito, Senate Appropriations Committee
Kirk Feely, Fiscal Director, Senate Republican Caucus

April 27, 2026

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

Re: **AB 1883 (Bryan): Workplace surveillance tools.**
As amended April 13, 2026 – OPPOSE
To be heard in Assembly Committee on Appropriations on April 29, 2026

Dear Chair Wicks,

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), California Association of Recreation and Park Districts (CARPD), 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 most 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 rapid integration 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.

Restricts security 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 *infers* information about workers engaging in activity protected by state or federal law. While amendments to Section 1581(b) are intended to provide some use of technology for security, it is not clear how agencies should interpret the language, as it would prohibit tools that incorporate AI to *make inferences* or *predictions* based on facial recognition or other tools.

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

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 *infer* or *predict* 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. More commonly, public agencies use security systems with advanced technology used to keep workers and the public safe. Examples of what constitutes facial recognition are clear, but it's less certain what could be defined as *emotional* or *gait recognition.* We are aware of advanced security cameras used in public health care settings that have identified an individual outside a hospital displaying symptoms of a stroke. The hospital was able to provide aid to the individual. We continue to have concerns about limitations on technology that can benefit the public and the workforce.

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 with rapid compliance deadlines. While we acknowledge the amendments reduce the statutory fine in § 1582(e), the bill would subject public agencies to civil actions, making them liable for punitive damages and attorney fees.

[2] Government Code §§ 3506 & 3506.5

Heightens fiscal pressure on public agencies
Public agencies are facing considerable cost pressure from all fronts and AB 1883 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment and growing special education program demands. For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

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 respectfully **opposed** to AB 1883 and urge your "NO" vote.

Sincerely,

Eric Lawyer
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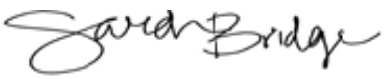

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CC: The Honorable Isaac Bryan, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Jay Dickenson, Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Consultant, Assembly Republican Caucus

April 30, 2026

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

Re: **AB 1883 (Bryan): Workplace surveillance tools.**
As amended April 13, 2026 – OPPOSE
Assembly Committee on Appropriations – Suspense File

Dear Chair Wicks,

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), California Association of Recreation and Park Districts (CARPD), California Association of School Business Officials, 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 most 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 rapid integration 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.

Restricts security 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 *infers* information about workers engaging in activity protected by state or federal law. While amendments to Section 1581(b) are intended to provide some use of technology for security, it is not clear how agencies should interpret the language, as it would prohibit tools that incorporate AI to *make inferences* or *predictions* based on facial recognition or other tools.

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

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 *infer* or *predict* 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. More commonly, public agencies use security systems with advanced technology used to keep workers and the public safe. Examples of what constitutes facial recognition are clear, but it's less certain what could be defined as *emotional* or *gait recognition.* We are aware of advanced security cameras used in public health care settings that have identified an individual outside a hospital displaying symptoms of a stroke. The hospital was able to provide aid to the individual. We continue to have concerns about limitations on technology that can benefit the public and the workforce.

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 with rapid compliance deadlines. While we acknowledge the amendments reduce the

[2] Government Code §§ 3506 & 3506.5

statutory fine in § 1582(e), the bill would subject public agencies to civil actions, making them liable for punitive damages and attorney fees.

Heightens fiscal pressure on public agencies
Public agencies are facing considerable cost pressure from all fronts and AB 1883 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment and growing special education program demands. For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

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 respectfully **opposed** to AB 1883 and urge your “NO” vote.

Sincerely,

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Mishaal Gill
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California Association of School Business Officials
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CC: The Honorable Isaac Bryan, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Jay Dickenson, Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Consultant, Assembly Republican Caucus

April 28, 2026

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

Re: **AB 1898 (Schultz): Workplace artificial intelligence tools.**
As amended March 20, 2026 – OPPOSE
To be heard in Assembly Committee on Appropriations

Dear Chair Wicks

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 Recreation and Park Districts (CARPD), California Association of School Business Officials (CASBO), California Association of Joint Powers Authorities (CJAPA), 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 public agencies, endanger our ability to perform essential public services, and make local governments vulnerable to waste, fraud, and abuse of public resources.

AB 1898 would impose unknown, but likely significant, costs on all public agencies, including the state's 58 counties, 483 cities, thousands of special districts, roughly 1000 school districts, and all state agencies. These costs include extensive compliance measures and frequent notification, as well as direct liability for legal fees, defense costs, and direct fines.

Public employers engage in the transparent and ethical use of workplace technologies like artificial intelligence (AI) or automated decision systems (ADS). Public agencies are required to meet and confer in good faith with public employee representatives over the terms and conditions of the workplace[1]. This longstanding law compels public agencies and unions to bargain in good faith over terms and conditions of employment, including the adoption and use of the kinds of tools defined in this and other bills that have a material effect in the workplace.

We have fundamental concerns with bills that aim to restrict how public agencies can use tools that improve service delivery or provide security for the public we serve or the public workforce.

- We oppose any legislation that would 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 most public employees have a property interest in their position that is protected by due process[2].

We understand the reasonable concerns one could have about the rapid integration 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.

Imposes significant fiscal pressures on the state, local agencies, and schools
AB 1898 would impose a variety of new fiscal and administrative pressures on all levels of government in California through direct compliance costs, indirect operational impacts, and new legal liability.

Public agencies would be required to notify employees of all AI tools that are used to assist in employment-related decisions or to surveil workers by February 1, 2027, and an annual list of workplace AI tools by February 1, 2028, and every year thereafter. Additionally, public agencies must provide notices for new tools at least 90 days

[1] Gov. Code § 3505
[2] California Supreme Court in Skelly v. State Personnel Board (1975) 15 Cal.3d 194

before their adoption. At the risk of significant fines and civil liability, public agencies will likely find themselves forced to overreport tools in the workplace, imposing substantial administrative costs and employee labor burdens.

Compliance would require significant work and collaboration across local agency departments to conduct compliance audits before the bill takes effect, including IT professionals, legal counsel, and respective department heads and subject matter experts. Employers would be required to inventory all workplace AI tools, prepare detailed written notices for affected employees and exclusive bargaining representatives, and update internal processes to prevent inadvertent violations.

These expensive and sweeping requirements would redirect our workforces and limited budgets toward rapid compliance deadlines rather than essential public services. This unfunded mandate will unnecessarily drain public resources at a time of unprecedented budget uncertainty for government agencies and schools.

Imposes unfocused and burdensome notice requirements on public agencies
By requiring employers to provide notice regarding workplace technology tools, AB 1898 is similar to legislation that was vetoed in 2025. In the Governor's veto message of SB 7 (McNerney, 2025), the Governor stated:

> "…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."

In some ways, AB 1898 would go much further than SB 7 in mandating employer notices. First, the bill would require notice 90 days before a tool is used, three times the notice period required in SB 7. AB 1898 would also require an annual notice, whereas SB 7 did not. AB 1898 would apply more broadly to any AI, ADS, or *workplace surveillance tool* that uses artificial intelligence used in the workplace for discipline or surveillance. Finally, AB 1898 would require notices to include the specific name of a model used, general locations of tools used, and specific job roles that could be impacted – information that was not required in SB 7.

Workplace surveillance tools that use artificial intelligence
Recent amendments narrow the bill's applications from a broad definition of a "workplace surveillance tool," to a "workplace surveillance tool *that uses artificial intelligence."* Counties, schools, and other public agencies already use routine security

tools that incorporate artificial intelligence, including ID badge systems and security cameras. Work cell phones, public fleets, mobile applications, and GPS trackers already incorporate AI. These tools are not used by public agencies to undermine bargaining or intrude on the lives of public employees. They are an increasingly ubiquitous aspect of tools used to provide essential public services, to keep public facilities safe, and to make government more efficient in addressing the needs of our communities.

Burdensome and unclear notice requirements

The March 20, 2026, amendments create a confusing and onerous requirement for employee notices. Section 1601(c) mandates employers to "…require a worker to sign and confirm they received and understand…" the notice regarding use of workplace AI tools. While the amendments include deletion of language that would have provided a *clear* single worker veto of these tools, it is unclear what is intended by the remaining language. Are employers compelled to discipline employees that do not sign the notice? Is the employer allowed to use the tool without signatures from all affected workers?

Our coalition remains concerned about any pre-use notice standard. AB 1898 requires employers to provide at least 90 days of notice before introducing a workplace AI tool. If agencies are prevented from deploying a tool used for security or operations by an arbitrary deadline, they would be faced with the choice of either operating without those benefits or delaying services. Consider the opening of a new homeless shelter. Under this law, a city or county could be required to delay operations until they meet the bill's three-month notice timeframe. For workers, the frequent notices required by this bill could lead to notice fatigue.

Undermines tools used to investigate fraud and abuse

The notice required by this bill must contain, among other things, a description of the general locations and the categories of activities, communications, and job roles that will be surveilled and the technologies that 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.

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[3]. 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. In the case of another cyberattack akin to the SolarWinds breach[4], public agencies would be made even more vulnerable due to the bill's disclosure requirements. A hacker could know exactly which tools are used by a public agency with vulnerable software.

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.

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[3] https://www.justice.gov/usao-edca/pr/former-state-employee-sentenced-over-5-years-prison-2m-scheme-defraud-office-aids

[4] SolarWinds cyberattack demands significant federal and private-sector response, *Government Accountability Office* (April 2021)

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
As stated earlier, public agencies have an obligation to meet and confer with labor representatives in good faith over terms and conditions of the workplace. Those obligations are broadly defined and have been interpreted over the decades by the Public Employment Relations Board (PERB) based on the unique conditions of public workplaces. AB 1898 needlessly subjects public agencies to significant administrative burdens, legal risk, and new costs despite existing legal obligations that are consistent with the purpose of the bill.

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 with rapid compliance deadlines. While we acknowledge the amendments reduce the statutory fine in § 1602(e), the bill would subject public agencies to civil actions, making them liable for punitive damages and attorney fees.

Heightens fiscal pressure on public agencies
Public agencies are facing considerable cost pressure from all fronts and AB 1898 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment and growing special education program demands. For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million-dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

Put simply, we do not believe the costs, burden, and risks brought by this bill are necessary for public agencies. 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
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elawyer@counties.org

Jean Hurst
Legislative Representative
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Sarah Dukett
Policy Advocate
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Aaron Avery
Director of State Legislative Affairs
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Mishaal Gill
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Ethan Nagler
Legislative Representative
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Faith Borges
Legislative Advocate
California Association of Joint Powers Authorities
fborges@publicpolicypartnership.com

CC: The Honorable Nick Schultz, Member, California State Assembly
Members and Consultants, Assembly Committee on Appropriations
Jay Dickenson, Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Consultant, Assembly Republican Caucus

URBAN COUNTIES
OF CALIFORNIA

2026 UCC Leadership

Supervisor Rich Desmond, Chair
Sacramento County

Supervisor Kathryn Barger, Vice-Chair
Los Angeles County

April 29, 2026

The Honorable Tina McKinnor
California State Assembly
1021 O Street, Suite 5520
Sacramento, CA 95814

Re: **AB 1908 (McKinnor): Civil actions: victims' compensation funding: validating proceedings**
As revised 4/15/25 – SUPPORT

Dear Assembly Member McKinnor:

On behalf of the Urban Counties of California (UCC), I write to express our support for your Assembly Bill 1908, a measure that would provide clarification to the existing law related to validation actions to specify that bonds and other forms of debt financing necessary to satisfy the obligations of a victims' compensation fund is authorized as of the date the establishment of such a fund via the adoption of a resolution or ordinance by a county board of supervisors. This important legislation will assist those counties seeking to finance a victims' compensation fund.

As you are keenly aware, counties, as well as other local agencies, are facing significant legal exposure and considerable costs for civil claims. As a result, funding these claims has become especially difficult. Los Angeles County, for example, faces many billions of dollars in liability stemming from childhood sexual assaults occurring at several county-run youth facilities. One avenue to help facilitate payments to claimants is a self-funded victims' compensation fund. The challenge, however, is financing the fund when cash is not readily available. Obligation bonds are commonly used to pay awards from bench and jury trials, as well as court-approved settlements. Current law, however, limits their use to these types of legal obligations. The Code of Civil Procedure does not allow obligation bonds to finance a victims' fund. AB 1908 provides the legal mechanism to do exactly that.

1127 11TH STREET,
SUITE 810
SACRAMENTO, CA 95814
916.327.7531
URBANCOUNTIES.COM

AB 1908 addresses a statutory gap by giving counties the flexibility to consider creating a victims' fund to cover civil liabilities that are so large as to necessitate the use of obligation bonds. As a result, UCC is in support of AB 1908.

Please do not hesitate to reach out if you have questions regarding our position.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

cc: Andi Liebenbaum, County of Los Angeles

April 27, 2026

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

Re: **Assembly Bill 1961 (Ahrens). Civil actions: protective orders: workplace violence.**
As Amended April 16, 2026 – SUPPORT
To be heard in Assembly Committee on Appropriations

Dear Chair Wicks,

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. The bill should have marginal fiscal impacts, as it does not require public agencies to implement a new program or higher level of service, but rather allows agencies to respond to workplace threats.

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 from the public. In recent years, county registrars have faced bomb threats[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 all employees at the employer's workplace or a location where a group of employees perform their primary job duties. 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

[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)

Jean Hurst
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Faith Borge
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Association of Joint Powers Authorities
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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 Appropriations
Jay Dickenson, Chief Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director, Assembly Committee on Appropriations

RURAL COUNTY REPRESENTATIVES OF CALIFORNIA

LEAGUE OF CALIFORNIA CITIES

URBAN COUNTIES OF CALIFORNIA

April 28, 2026

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

RE: Assembly Bill 2170 – OPPOSE
As Amended April 22, 2026

Dear Assembly Member Boerner:

On behalf of the Rural County Representatives of California (RCRC), League of California Cities (Cal Cities), Urban Counties of California (UCC), and California State Association of Counties (CSAC), we 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 broad universe of industrial projects located in or within ½ mile of an "overburdened community." AB 2170 also requires translation of a large number of CEQA notices and imposes a new obligation for local agencies to have in-person interpretation 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. The April 22 amendments also significantly reduce the utility of a newly created CEQA streamlining process for housing 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 "industrial" projects 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 statutory CEQA exemptions and significantly increases project costs, complexity, and litigation risk.

AB 2170's "overburdened community" provision applies to all projects that include development, intensification, or expansion of an industrial use; however, the bill provides no definition as to what constitutes an "industrial use." Zoning varies from jurisdiction to jurisdiction and so the ambiguity as to what constitutes an "industrial uses" impairs regulatory certainty and could lead to increased litigation. Industrial uses would encompass what one traditionally considers to be industrial, like solid waste management, manufacturing, auto dismantling, fuel storage, and animal slaughter; however, it could also include a broad array of activities that are not traditionally viewed as "industrial", including aquaculture, cannabis testing and manufacturing, research laboratories, lumber yards, truck retail and sales yards, public utility yards, recycling facilities, etc.

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. The Legislature has long debated the necessary distance requirements for sensitive receptors near industrial sites in a variety of bills - a ½ a mile radius is far-reaching and will result in an extremely broad radius. 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.

AB 2170 precludes the use of statutory CEQA exemptions, which will require local agencies and developers to perform unnecessary environmental analyses for projects that already qualify for existing exemptions. The real risk associated with this requirement 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 that would now have to be prepared. This tips the scale against project developers and could be 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.

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 CEQA exemptions.

AB 2170 undermines a newly created CEQA streamlining process to expedite the construction of housing

Amendments adopted on April 22 expand the scope of AB 2170 to additionally limit the applicability of a newly created CEQA streamlining process for housing projects. Last year's SB 131 (Budget) created a streamlined CEQA review process for housing projects that would have otherwise been exempt from CEQA but for the existence of a single disqualifying condition. For those projects, the CEQA process is limited to only those impacts caused by the single condition that made the project ineligible for the exemption. Similarly, the environmental review is not required to discuss alternatives or growth inducing impacts of the project.

For example, several CEQA exemptions for housing projects cannot be used if the project is located on lands that may be habitat for protected species. If the housing project meets all the other requirements to use the exemption except that the project site may include habitat for a protected species, SB 131 allows the environmental review to focus *exclusively* on the project's

impact to habitat. The project would not have to evaluate any other environmental impacts, discuss project alternatives, or the project's growth inducing impacts. As a result, the environmental review would focus on that particular aspect of the project that would have precluded it from using the exemption.

Unfortunately, the April 22 amendments bar use of the "almost exempt" streamlining pathway for housing projects any time the project site includes habitat for protected species or contains plants subject to the Native Plant Protection Act. As a result, AB 2170 would subject those housing projects to the entire CEQA review process, including the inherent litigation risk and delays. Simply stated, AB 2170 significantly rolls back some of the most innovative CEQA streamlining processes for housing projects.

Ironically, AB 2170 undermines a CEQA streamlining process that includes more environmental disclosure, review, and mitigation than the traditional CEQA exemptions (and ministerial permit processes) that have become the new strategy for CEQA relief.

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

AB 2170 requires a broad array of CEQA notices to be translated into "threshold languages," a term which is itself ambiguously crafted and departs from long-standing definitions. Depending on the 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 its way through the 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 interpretation services 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 and interpretation 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" are not a basis for invalidating a public agency decision unless the error precluded relevant information from being presented to the public. 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. CEQA is litigious enough - local agencies should not be subject to ***any*** 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,

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JEAN HURST
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Legislative Representative
jkh@hbeadvocacy.com

cc: The Honorable Buffy Wicks, Chair, Assembly Appropriations Committee
Members of the Assembly Appropriations Committee
Nikita Koraddi, Consultant, Assembly Appropriations Committee
John Fitzpatrick, Consultant, Assembly Republican Caucus

May 1, 2026

The Honorable Buffy Wicks, Chair
Assembly Appropriations Committee
1021 O Street, Suite 8150
Sacramento, CA 95814

Re: **AB 2224 (Hadwick): County recorders: fees**
As amended 3/17/25 – SUPPORT
Awaiting hearing – Assembly Appropriations Committee

Dear Assembly Member Wicks:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), and the California State Association of Counties (CSAC), we write to share our support for Assembly Bill 2224, a measure that updates and modernizes the statutory fees for county recorders' services. Across the state, county recorders provide important public services and serve as the custodian of vital records, recorded land documents, and other legal documents that support the integrity of property ownership and other legal transactions.

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

AB 2224 updates the maximum fee a county recorder may charge for recording the first page of a document from $10 to $15 and additional pages from $3 to $4. These proposed adjustments are consistent with relative increases in the Consumer Price Index and still must reflect cost recovery. In addition, each county will be required to move to an electronic recording delivery system, which will allow the elimination of outdated fees. Further, AB 2224 requires that the fees collected are dedicated to, and solely utilized for, the county recorder's office, and prohibits the fees from exceeding the reasonable costs of the document recording function. While counties generally would prefer flexibility in directing such fees, the county recorders' offices fees are so woefully out of date, we recognize the utility of such a provision.

AB 2224 is an important measure to ensure that services provided by county recorders' offices are not subsidized by the general public through a reasonable update to statutory maximum fees. We greatly appreciate your "aye" vote on this important measure.

Sincerely,

Jean Kinney Hurst
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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

cc: Members and Consultants, Senate Local Government Committee
The Honorable Heather Hadwick, California State Assembly

May 1, 2026

The Honorable Buffy Wicks, Chair
Assembly Appropriations Committee
1021 O Street, Suite 8150
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 Appropriations Committee

Dear Assembly Member Wicks:

On behalf of the Urban Counties of California, the Rural County Representatives of California, the California State Association of Counties, the California Special Districts Association, and the League of California Cities, we write to share our opposition to 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

Johnnie Pina
Legislative Affairs, Lobbyist
League of California Cities

cc: The Honorable Jessica Caloza, California State Assembly
Members and Consultants, Assembly Appropriations Committee

April 28, 2026

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

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

Dear Assemblymember Wicks:

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. Constitutions 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 does 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, which would create 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 to 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 the language, "*upon appropriation of funds from the Legislature*" 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
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RYAN MORIMUNE
California State Association of Counties
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JOSH GAUGER
Urban Counties of California
Legislative Representative
jdg@hbeadvocacy.com

cc: The Honorable Joaquin Arambula, Member of the California State Assembly
Members of the Assembly Appropriations Committee
Jennifer Swenson, Principal Consultant, Assembly Appropriations Committee
Tobias Wolken, Consultant, Assembly Republican Caucus

April 30, 2026

The Honorable Dawn Addis
Chair, Assembly Budget Subcommittee No. 1
1021 O Street, Suite 4120
Sacramento, CA 95814

RE: Behavioral Health Services Act Revenue and Stability TBL – Oppose Unless Amended

Dear Assembly Member Addis,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write to respectfully oppose the Administration's Behavioral Health Services Act (BHSA) Revenue and Stability trailer bill proposal.

The Governor's Budget proposes trailer bill language to implement the Department of Health Care Services' Behavioral Health Services Act Revenue Stability Workgroup Report, published in May 2025. Among other things, the proposal establishes a county minimum spending requirement and modifies the limits and accessibility of county prudent reserves, however, it does not entirely align with the recommendations of the workgroup.

CSAC is opposed to the proposed trailer bill language, unless it is amended as follows:

- Maintain existing BHSA prudent reserve levels of 20% instead of dropping them to 10% to ensure greater fiscal stability across revenue changes. In addition, maintain existing BHSA prudent reserve levels for rural counties under 200,000 population at 25% instead of dropping them to 15%. This is of even greater importance as counties begin using BHSA funding for rental subsidies; a lack of sufficient reserves to offset revenue declines could result in people losing their housing.

- Provide greater flexibility for counties to access prudent reserves so that counties can account for unexpected changes in budgeted expenditures, whether through policy changes, such as the possibility of the loss of state funding for mobile crisis services, or the outcome of wildfires and other natural and other disasters at the local level.

- Allow counties to adjust funding allocations across BHSA components on a year-to-year basis, rather than every three years given the general economic uncertainty. This will allow counties to react to year-to-year changes in funding levels and demand for services at local level.

- Establish criteria, in partnership with counties, for calculating the county minimum expenditure level.

Counties – like the state – are entering a time of significant budget uncertainty due to the cost shifts created by the federal government in 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. In this fiscal environment, we are deeply concerned about proposed trailer bill language that limit counties' tools to plan for budget uncertainty just as H.R. 1 puts new county costs pressures on counties.

For these reasons, CSAC, UCC and RCRC respectfully urge the Legislature to modify the Administration's proposed trailer bill to allow counties to effectively manage BHSA revenues. Should you have any questions, please do not hesitate to contact us.

Sincerely,

Brendan McCarthy
Senior Legislative Advocate
California State Association of Counties
bmccarthy@counties.org

Sarah Dukett
Senior Policy Advocate
RCRC
sdukett@rcrcnet.org

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

cc: Honorable Members, Assembly Budget Subcommittee No. 1
Christian Griffith, Chief Consultant, Assembly Budget Committee
Patrick Le, Consultant, Assembly Budget Committee
Joe Shinstock, Fiscal Director, Assembly Republican Caucus
Eric Dietz, Principal Consultant, Assembly Republican Caucus

April 30, 2026

The Honorable Caroline Menjivar
Chair, Senate Budget & Fiscal Review Subcommittee No. 3
1021 O Street, Suite 6630
Sacramento, CA 95814

RE: Behavioral Health Services Act Revenue and Stability TBL – Oppose Unless Amended

Dear Senator Menjivar,

On behalf of the California State Association of Counties (CSAC), Urban Counties of California (UCC) and the Rural County Representatives of California (RCRC), we write to respectfully oppose the Administration's Behavioral Health Services Act (BHSA) Revenue and Stability trailer bill proposal.

The Governor's Budget proposes trailer bill language to implement the Department of Health Care Services' Behavioral Health Services Act Revenue Stability Workgroup Report, published in May 2025. Among other things, the proposal establishes a county minimum spending requirement and modifies the limits and accessibility of county prudent reserves, however, it does not entirely align with the recommendations of the workgroup.

CSAC is opposed to the proposed trailer bill language, unless it is amended as follows:

- Maintain existing BHSA prudent reserve levels of 20% instead of dropping them to 10% to ensure greater fiscal stability across revenue changes. In addition, maintain existing BHSA prudent reserve levels for rural counties under 200,000 population at 25% instead of dropping them to 15%. This is of even greater importance as counties begin using BHSA funding for rental subsidies; a lack of sufficient reserves to offset revenue declines could result in people losing their housing.

- Provide greater flexibility for counties to access prudent reserves so that counties can account for unexpected changes in budgeted expenditures, whether through policy changes, such as the possibility of the loss of state funding for mobile crisis services, or the outcome of wildfires and other natural and other disasters at the local level.

- Allow counties to adjust funding allocations across BHSA components on a year-to-year basis, rather than every three years given the general economic uncertainty. This will allow counties to react to year-to-year changes in funding levels and demand for services at local level.

- Establish criteria, in partnership with counties, for calculating the county minimum expenditure level.

Counties – like the state – are entering a time of significant budget uncertainty due to the cost shifts created by the federal government in 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. In this fiscal environment, we are deeply concerned about proposed trailer bill language that limit counties' tools to plan for budget uncertainty just as H.R. 1 puts new county costs pressures on counties.

For these reasons, CSAC, UCC and RCRC respectfully urge the Legislature to modify the Administration's proposed trailer bill to allow counties to effectively manage BHSA revenues. Should you have any questions, please do not hesitate to contact us.

Sincerely,

Brendan McCarthy
Senior Legislative Advocate
California State Association of Counties
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Sarah Dukett
Senior Policy Advocate
RCRC
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Kelly Brooks-Lindsey
Legislative Representative
UCC
kbl@hbeadvocacy.com

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 28, 2026

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

Re: **SB 947 (McNerney) Employment: automated decision systems.**
OPPOSE *(As Amended April 22, 2026)*

Dear Chair Cervantes:

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, Public Risk Innovation, Solutions, and Management, and California Association of Recreation and Park Districts, 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 notable and costly steps backwards from the enrolled version of SB 7, directly

implicating the concerns raised by the Governor. Specifically, 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 whenever an ADS output is primarily relied on to discipline, terminate, or deactivate a worker. The notification requirements of the bill have also grown more extensive and detailed. Increasing the burdens of compliance will deter local governments from using these important 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 as well as Proposition 98 dollars intended for students and classrooms.

The bill's enforcement provisions, including a private right of action, expose local governments and schools to increased litigation risk and costs. For schools, this is a direct drain on Prop 98 funding. 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, and schools facing declining enrollment, 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 local 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 these 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 primarily relied on 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. Ensuring compliance with 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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CC:

The Honorable Jerry McNerney
Honorable Members, Senate Appropriations Committee
Robert Ingenito, Consultant, Senate Appropriations Committee
Heather Wood, Budget Consultant, Senate Republican Caucus

April 28, 2026

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

RE: Senate Bill 951 (Reyes) – OPPOSE UNLESS AMENDED
As Amended April 22, 2026

Dear Senator Cervantes:

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), Public Risk Innovations, Solutions, and Management (PRISM), University of California Office of the President (UCOP), California Association of Recreation and Parks Districts (CARPD) and Association of California Healthcare Districts (ACHD) we must regretfully oppose Senate Bill 951 (Reyes), regarding workforce displacement or termination due to the adoption of certain technologies, unless amended to exempt local government employers.

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 in whole or substantial part by the use of artificial intelligence (AI) or other automated technology (undefined). For employers of 100 or more employees, it would establish return rights for terminated employees and prohibit termination during the 90-day notice period. Compliance failure would cause 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 would allow 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, our organizations 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" would 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 would create liability exposure for complaints brought by any member of the public for possible violations.

For these reasons, we 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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cc: The Honorable Eloise Gomez Reyes, Member of the California State Assembly
Members of the Senate Appropriations Committee
Bob Franzoia, Consultant, Senate Appropriations Committee
Morgan Branch, Policy Consultant, Senate Republican Caucus

April 30, 2026

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

RE: Senate Bill 989 (Blakespear) – Community Assistance, Recovery and Empowerment Act (CARE) Court – REMOVE OPPOSITION

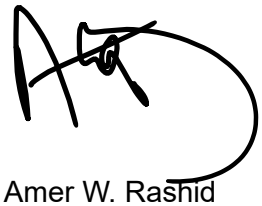
Dear Chair Cervantes,

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 are writing to remove our opposition to Senate Bill 989, as amended on April 16, 2026.** Our respective associations are appreciative that the county concerns identified in our coalition letter dated April 10, 2026, are addressed in the latest amendments and this bill now allows first responders to make referrals to county behavioral health agencies, allowing the county to decide whether an assessment is appropriate for an individual.

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. In certain counties, first responders are already making referrals to county outreach and engagement teams in which information is reviewed, and a targeted outreach to complete a clinical assessment is done. This bill now formalizes in statute that first responders can make these referrals to county behavioral health agencies and will encourage improved delivery of critical health services to populations across the state that need it most.

For the reasons above, **we are no longer opposed to SB 989, and this letter serves to formally remove our opposition to the bill.** For questions, please feel free to contact our respective organizations below.

Sincerely,



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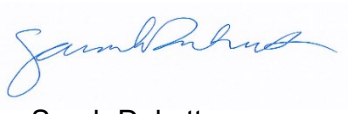

Sarah Dukett
Policy Advocate
RCRC
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CC: Honorable Senator Catherine Blakespear
Honorable Members of the Senate Appropriations Committee
Agnes Lee, Consultant, Senate Appropriations Committee
Joe Parra, Policy Consultant, Senate Republican Caucus

April 29, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
State Capitol, Room 412
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 Appropriations Committee May 4, 2026

Dear Chair Cervantes,

The California State Association of Counties (CSAC), Urban Counties of California (UCC), Rural County Representatives of California (RCRC), and League of California Cities (CalCities) 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 all California public agencies 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.

SB 1319 could cause California's pension systems to lose an investment opportunity that typically has an expected investment return above the discount rate. That would likely cause the systems to reduce their discount rate accordingly, causing direct cost increases for the state, all local agencies and schools, and public employees. These costs could easily reach billions for public agencies.

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.

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

Enhances pressure on public agencies

Public agencies are facing considerable cost pressure from all fronts and SB 1319 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing protections in statute for public employees as well as locally bargained labor agreements.

For counties, implementation of H.R. 1. is expected to 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. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multimillion dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

Sincerely,

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Johnnie Piña
Legislative Advocate
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CC: The Honorable Maria Elena Durazo
Members, Senate Appropriations Committee
Bob Franzoia, Consultant, Senate Appropriations Committee
Jesse Herzer, Policy Consultant, Senate Republican Caucus

April 22, 2026

The Honorable Sharon Quirk-Silva, Chair
Assembly Budget Subcommittee No. 5
1021 O Street, Suite 4210
Sacramento, CA 95814

Re: **Item 9210: Local Government Financing**
Request Insufficient ERAF/VLF Backfill Amounts for Alpine, Mono, and San Mateo Counties

Dear Assembly Member Quirk-Silva:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the California State Association of Counties (CSAC), and the League of California Cities (CalCities), we write to respectfully urge your consideration for including an appropriation to backfill the insufficient ERAF amounts in the Counties of Alpine, Mono, and San Mateo. The Governor's proposed 2026-27 state budget, regrettably, does not include a backfill of these funds, which will significantly impact local programs and services.

In 2004, a state budget compromise between the state and its counties and cities was struck to permanently reduce taxpayer's Vehicle License Fee (VLF) obligations by 67.5 percent. The VLF had served as an important general purpose funding source for county and city programs and services since its inception. In exchange for this revenue reduction, the state provided counties and cities with an annual in-lieu VLF amount (adjusted annually to grow with assessed valuation) to compensate for the permanent loss of VLF revenues with revenues from each county's Educational Revenue Augmentation Fund (ERAF); this transaction became known colloquially as the "VLF Swap." The 2004 budget agreement made clear that excess ERAF funds – shifted property tax revenues that were not needed to fully fund K-14 schools – would not be used to fund the in-lieu VLF amount. Further, the Legislature and Administration agreed to a ballot measure – Proposition 1A – that amended the Constitution to ensure that future shifts or transfers of local agency property tax revenues could not be used to pay for state obligations. That November, Proposition 1A was approved by 83.7 percent of voters.

Legislation to implement the VLF swap carefully and purposefully identified the sources of funds that were available to pay the state's in-lieu VLF obligation: ERAF distributions to non-basic aid schools and property tax revenues of non-basic aid schools. Proposition 98 ensures that state funds are provided to those schools to meet their constitutional funding guarantee, so they do not experience any financial loss. However, in those instances where there are too few non-basic aid schools in a county from which to transfer sufficient funds to pay the state's in-lieu VLF obligation, the state has historically provided annual appropriations to make up for the revenue shortfalls.

The Governor's 2026-27 proposed budget failed to include funds to ensure that these counties and cities are held harmless for losses associated with the VLF Swap. Without backfill, these counties and the cities therein – through no fault of their own – will endure a significant reduction in general purpose revenue that will directly affect the provision of local programs and services in their respective communities, at precisely the time when our respective members are being asked to do more. As a result, we respectfully urge you to consider appropriating funds for this purpose.

Sincerely,

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Mary-Ann Warmerdam
Senior Vice President, Government Affairs
Rural County Representatives of California

Emma Jungwirth
Legislative Advocate
California State Association of Counties

Ben Triffo
Legislative Advocate
League of California Cities

cc: Members and Consultants, Assembly Budget Subcommittee No. 5
Jay Kapoor, Assistant Program Budget Manager, Department of Finance
Chris Hill, Principal Program Budget Analyst, Department of Finance

April 22, 2026

The Honorable Melissa Hurtado, Chair
Senate Budget Subcommittee No. 4
1021 O Street, Suite 6510
Sacramento, CA 95814

Re: **Item 9210: Local Government Financing**
Request Insufficient ERAF/VLF Backfill Amounts for Alpine, Mono, and San Mateo Counties

Dear Senator Hurtado:

On behalf of the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the California State Association of Counties (CSAC), and the League of California Cities (CalCities), we write to respectfully urge your consideration for including an appropriation to backfill the insufficient ERAF amounts in the Counties of Alpine, Mono, and San Mateo. The Governor's proposed 2026-27 state budget, regrettably, does not include a backfill of these funds, which will significantly impact local programs and services.

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Legislation to implement the VLF swap carefully and purposefully identified the sources of funds that were available to pay the state's in-lieu VLF obligation: ERAF distributions to non-basic aid schools and property tax revenues of non-basic aid schools. Proposition 98 ensures that state funds are provided to those schools to meet their constitutional funding guarantee, so they do not experience any financial loss. However, in those instances where there are too few non-basic aid schools in a county from which to transfer sufficient funds to pay the state's in-lieu VLF obligation, the state has historically provided annual appropriations to make up for the revenue shortfalls.

The Governor's 2026-27 proposed budget failed to include funds to ensure that these counties and cities are held harmless for losses associated with the VLF Swap. Without backfill, these counties and the cities therein – through no fault of their own – will endure a significant reduction in general purpose revenue that will directly affect the provision of local programs and services in their respective communities, at precisely the time when our respective members are being asked to do more. As a result, we respectfully urge you to consider appropriating funds for this purpose.

Sincerely,

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Urban Counties of California

Mary-Ann Warmerdam
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cc: Members and Consultants, Senate Budget Subcommittee No. 4
Jay Kapoor, Assistant Program Budget Manager, Department of Finance
Chris Hill, Principal Program Budget Analyst, Department of Finance

April 21, 2026

The Honorable Buffy Wicks
Chair, California State Assembly Committee on Appropriations
1021 O St, Room 8220
Sacramento, CA 95814

RE: AB 1821 (Pacheco) California Public Records Act: agency response time. As Amended April 6, 2026 – SUPPORT

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.

We appreciate the author's efforts and remain committed to continued conversations about broader CPRA reform. The business-day clarification 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,

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Legislative Representative

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cc: The Honorable Blanca Pacheco, Member, California State Assembly
Members, Assembly Committee on Appropriations
Shiran Zohar, Principal Consultant, Assembly Committee on Appropriations
Joe Shinstock, Fiscal Director, 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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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 22, 2026

Mr. Ian Choudri
Chief Executive Officer
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

Re: 2026 Draft Business Plan Comments on Proposed Tax Increment Financing Authority

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 indication in the 2026 Draft Business Plan they are seeking authority to establish Tax Increment Financing (TIF) and Enhanced Infrastructure Financing Districts (EIFD).

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 on page 32 of the Authority's 2026 Draft Business Plan, 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 EIFD's and Community Revitalization and Investment Authorities (CRIAs), the broader fiscal ecosystem is interconnected. Reduced city and county 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 2026 Draft Business plan proposed that the authority be given the authority to initiate value-capture models 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 cities, counties and special districts 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.

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 eliminate this language from their Draft 2026 Business Plan and instead engage collaboratively with local governments to identify funding strategies that consider both statewide infrastructure goals and local fiscal integrity.

Sincerely,

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CC: 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

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
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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
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Dorothy Johnson
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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 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,

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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
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BEN TRIFFO
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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

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
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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.

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
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elawyer@counties.org

Jean Hurst
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jkh@hbeadvocacy.com

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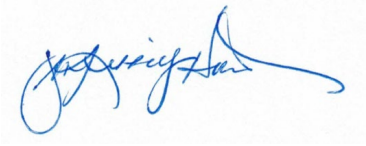
Sarah Dukett
Senior Policy Advocate
Rural County Representatives of California
sdukett@rcrcnet.org



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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 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
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California State Association of Counties

Chris Lee
Legislative Advocate
Urban Counties of California

Reuben Duarte
Vice President of Policy and Legislation
APA California

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]

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

[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.

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.

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 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
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Senior Policy Advocate
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League of California Cities
Legislative Advocate, Public Safety
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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
Members of the Senate Appropriations Committee
Bob Franzoia, Policy Consultant, Senate Office of Research
Eric Csizmar, 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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Emma Jungwirth
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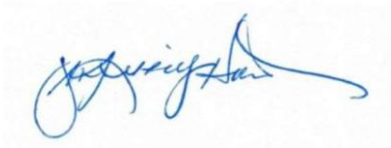

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Michael Pott
Chief Operating Officer
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CC:

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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JOHNNIE PINA
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

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
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Brendan McCarthy
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Kelly Brooks-Lindsey
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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

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.

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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
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jkh@hbeadvocacy.com

Sarah Dukett
Senior Policy Advocate
Rural County Representatives of
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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

Riverside County Board of Supervisors
Request to Speak

Submit request to the Clerk of the Board (right of podium), individual speakers are limited to a maximum of three (3) minutes, subject to Board Rules listed on the reverse side of this form. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board.

SPEAKER'S NAME: Roy

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 2.7

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** _____**Oppose** _____**Neutral**

Note: If you are here for an agenda item that is filed for "Appeal", please state separately your position on the appeal below:

_____**Support** _____**Oppose** _____**Neutral**

I give my 3 minutes to: _____

Do you need a Spanish translator? Yes_____ **No**_____

(Revised: 2/20/2026)

BOARD RULES

Requests to Address Board on "Agenda" items:
You may request to be heard on a published agenda item. Requests to be heard must be submitted to the Clerk of the Board before the scheduled meeting time.

Requests to Address Board on items that are "NOT" on the Agenda:
Notwithstanding any other provisions of these rules, member of the public shall have the right to address the Board during the mid-morning "Oral Communications" segment of the published agenda. Said purpose for address must pertain to issues which are under the direct jurisdiction of the Board of Supervisors. YOUR TIME WILL BE LIMITED TO THREE (3) MINUTES. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board.

Power Point Presentations/Printed Material:
Speakers who intend to conduct a formalized Power Point presentation or provide printed material must notify the Clerk of the Board's Office by 12 noon on the Monday preceding the Tuesday Board meeting, ensuring that the Clerk's Office has sufficient copies of all printed materials and at least one (1) copy of the Power Point CD. Copies of printed material given to the Clerk (by Monday noon deadline) will be provided to each Supervisor. If you have the need to use the overhead "Elmo" projector at the Board meeting, please ensure your material is clear and with proper contrast, notifying the Clerk well ahead of the meeting, of your intent to use the Elmo. Speakers are prohibited from bringing signs, placards, or posters into the hearing room.

Individual Speaker Limits:
Individual speakers are limited to a maximum of three (3) minutes. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board. Please step up to the podium when the Chair calls your name and begin speaking immediately. Pull the microphone to your mouth so that the Board, audience, and audio recording system hear you clearly. Once you start speaking, the "green" podium light will light. The "yellow" light will come on when you have one (1) minute remaining. When you have 30 seconds remaining, the "yellow" light will begin flash, indicating you must quickly wrap up your comments. Your time is up when the "red" light flashes. The Chair adheres to a strict three (3) minutes per speaker. ***Note: If you intend to give your time to a "Group/Organized Presentation", please state so clearly at the very bottom of the reverse side of this form.***

Group/Organized Presentations:
Group/organized presentations with more than one (1) speaker will be limited to nine (9) minutes at the Chair's discretion. The organizer of the presentation will automatically receive the first three (3) minutes, with the remaining six (6) minutes relinquished by other speakers, as requested by them on a completed "Request to Speak" form, and clearly indicated at the front bottom of the form.

Addressing the Board & Acknowledgement by Chair:
The Chair will determine what order the speakers will address the Board and will call on all speakers in pairs. The first speaker should immediately step to the podium and begin addressing the Board. The second speaker should take up a position in one of the chamber aisles to quickly step up to the podium after the preceding speaker. This is to afford an efficient and timely Board meeting, giving all attendees the opportunity to make their case. Speakers are prohibited from making personal attacks, and/or using course, crude, profane or vulgar language while speaking to the Board members, staff, the public and/or meeting participants. Such behavior, at the discretion of the Board Chair may result in removal from the Board Chambers by Sheriff Deputies.