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May 27, 2020
Commission on
State Mandates



County of San Diego

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May 27, 2020

Via Drop Box

Heather Halsey
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

RE: Comments on Proposed Decision

Vote by Mail Ballots: Prepaid Postage, 19-TC-01
Elections Code Section 3010; Statutes 2018, Chapter 120 (AB 216)
Interested Party County of San Diego

Dear Ms. Halsey:

I represent interested party County of San Diego (the "County"). The County appreciates the proposed decision largely in the local agencies' favor.

However, the County respectfully requests the Commission reconsider its conclusion that the mandate does not require reimbursement of prepaid postage for special elections. Section 3010 of the Elections Code does not distinguish among the types of elections for which prepaid postage is required; thus on its face, the statute requires Counties to provide prepaid postage for special elections.

The Commission relies on *Kern High School District* to hold that when a local agency makes an affirmative choice to hold a special election, that is a voluntary choice on the local agency's part and therefore not a state mandate. *Dept. of Finance v. Commission on State Mandates (Kern High School District)*, 30 Cal. 4th 727, 743 (2003). But the holding of *Kern High School District* is not a bright-line rule that any time a local agency makes a voluntary choice which results in incurring costs pursuant to a state mandate, the costs are mandated by the local agency instead of the state. This was clarified in subsequent cases interpreting *Kern High School District*.

In fact, the California Supreme Court had cause to reconsider that issue just over a year after it issued *Kern High School District*, in *San Diego Unified Sch. Dist. v. Comm'n*

on State Mandates (San Diego Unified School District), 33 Cal. 4th 859, 887–88 (2004). In that case, the Court held that a bright-line rule would violate the intent of Section 6:

The District and amici curiae on its behalf (consistently with the opinion of the Court of Appeal below) argue that the holding of *City of Merced*, *supra*, 153 Cal.App.3d 777, 200 Cal.Rptr. 642, should not be extended to apply to situations beyond the context presented in that case and in *Kern High School Dist.*, *supra*, 30 Cal.4th 727, 134 Cal.Rptr.2d 237, 68 P.3d 1203. The District and amici curiae note that although any particular expulsion recommendation may be discretionary, as a practical matter it is inevitable that some school expulsions will occur in the administration of any public school program.²²

Upon reflection, we agree with the District and amici curiae that there is reason to question an extension of the holding of *City of Merced* so as to preclude reimbursement under article XIII B, section 6 of the state Constitution and Government Code section 17514, whenever an entity makes an initial discretionary decision that in turn triggers mandated costs. Indeed, it would appear that under a strict application of the language in *City of Merced*, public entities would be denied reimbursement for state-mandated costs in apparent contravention of the intent underlying article XIII B, section 6 of the state Constitution and Government Code section 17514²³ and contrary to past decisions in which it has been established that reimbursement was in fact proper. For example, as explained above, in *Carmel Valley*, *supra*, 190 Cal.App.3d 521, 234 Cal.Rptr. 795, an executive order requiring that county firefighters be provided with protective clothing and safety equipment was found to create a reimbursable state mandate for the added costs of such clothing and equipment. (*Id.*, at pp. 537–538, 234 Cal.Rptr. 795.) The court in *Carmel Valley* apparently did not contemplate that reimbursement would be foreclosed in that setting merely because a local agency possessed discretion concerning how many firefighters it would employ—and hence, in that sense, could control or perhaps even avoid the extra costs to which it would be subjected. Yet, under a strict application of the rule gleaned from *City of Merced*, *supra*, 153 Cal.App.3d 777, 200 Cal.Rptr. 642, such costs would not be reimbursable for the simple reason that the local agency's decision to employ firefighters involves an exercise of discretion concerning, for example, how many firefighters are needed to be employed, etc. **We find it doubtful that the voters who enacted article XIII B, section 6, or the Legislature that adopted Government Code section 17514, intended that result, and hence we are reluctant to endorse, in**

this case, an application of the rule of *City of Merced* that might lead to such a result.

San Diego Unified School District, 33 Cal. 4th at 887–88 (emphasis added).

The Court determined in that case that it “need not address...the problems posed by such an application of the rule articulated in *City of Merced*” (the same rule considered in *Kern High School District*) because the case could be resolved “on an alternative basis.” *Id.* at 888. However, it is clear the Court disapproved of an expansive view of what constitutes a local agencies’ voluntary choice.

The Third District Court of Appeal later considered the issue in *Dep’t of Fin. v. Comm’n on State Mandates (City of Sacramento)*, 170 Cal. App. 4th 1355 (2009). The Court of Appeal acknowledged that the Supreme Court of California had rejected “extending [the rule regarding local agencies’ ‘voluntary’ decisions] whenever some element of discretion in incurring the cost existed, e.g., in deciding how many firefighters to hire into a fire department.” *City of Sacramento*, 170 Cal. App. 4th at 1364. The Court of Appeal stated in that case that state-mandated costs incurred by cities and counties as a result of cities and counties hiring peace officers would be reimbursable because providing for public safety was “an essential and basic function” of local governments, even if the number of peace officers hired was technically a voluntary choice. The Court held the same was not true for school districts, which did not have the same essential and basic function of providing for public safety. *Id.* at 1367-38.

The Third District Court of Appeal again considered this issue in *Coast Cmty. Coll. Dist. v. Comm’n on State Mandates (Coast Community College District)*, 47 Cal. App. 5th 415, 433 (2020), *as modified on denial of reh’g* (May 1, 2020). There, the Court held that the state’s requirement for community colleges to meet minimum conditions in order to receive state aid were reimbursable state mandates when the minimum conditions related to the “**underlying core functions** of the community colleges, functions compelled by state law.” 47 Cal. App. 5th at 433 (emphasis added). The Court distinguished *Kern High School District* because the school district’s decision to participate in the school programs in that case was not critical to its core functions and was truly voluntary. *Id.*

Considering these cases together, the question is not whether the local agencies made *any* initial discretionary choice that resulted in incurring state-mandated costs, but whether the subject of that purported choice was critical to their core functions. The County respectfully submits that calling special elections falls within the latter category. In certain cases, it is mandatory that a local agency call a special election. Cal. Elec. Code § 8026 (death of a candidate or incumbent); Cal. Elec. Code § 11242 (certain recall

elections). Special elections can also be called to fill vacancies on boards or offices (Cal. Gov't Code § 1780(e), Cal. Gov't Code § 36512) or so that the electorate can vote on initiatives or referendums. Cal. Elec. Code §§ 1405-1410. Broadly stated, local agencies can call special elections for purposes related to their essential duties of basic governance. See Cal. Const. art. XI, § 7 (“A county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws”); see also Cal. Gov't Code § 23004 (enumerated powers of a county).

Thus the decision to call special elections is similar to the decision to hire firefighters (as in the *Carmel Valley* case¹) or peace officers (as in the *City of Sacramento* case). That is, the County or other local agencies may need to make an initial discretionary decision about how many special elections to hold, but a local agency's core duty of basic governance is not discretionary.

Kern High School District is also distinguishable because the costs at issue in that case “appear[ed] rather modest”—around \$10,000 per fiscal year. *Kern High School District*, 30 Cal. 4th 727 at 747; *id.* n.16. The Court expressly stated that with increased costs, the analysis might be different:

It is conceivable, with regard to some programs, that increased compliance costs imposed by the state might become so great—or funded program grants might become so diminished—that funded program benefits would not cover the compliance costs, or that expenditure of granted program funds on administrative costs might violate a spending limitation set out in applicable regulations or statutes. In those circumstances, a compulsory program participant likely would be able to establish the existence of a reimbursable state mandate....

Id. at 747–48 (2003); see also *Coast Community College District*, 47 Cal. App. 5th at 433 (“*Kern* is also different because the costs associated with the requirements in that case were ‘modest.’ Here, however, the record does not establish that the costs to comply with the minimum conditions would be modest.”) (internal citations omitted).

Here, costs to provide postage for a special election also will not be modest. Using publicly-available numbers from the November 2018 election, the number of vote by mail ballots sent to voters in San Diego County alone was 1,297,557.² Using the

¹ *Carmel Valley Fire Prot. Dist. v. State of California*, 190 Cal. App. 3d 521 (1987), referenced in the *San Diego Unified School District* case, as quoted above.

² See “Absentee Issued” column of Exhibit F attached hereto, which is the first page of

“average cost of \$0.65 per envelope” cited by the Legislature in the legislative history of Section 3010 of the Elections Code,³ the cost of prepaid postage for every vote by mail voter in San Diego County for a special election called by the County would be \$843,412.05. And the numbers in reality will be greater than that—a 2-card ballot weighing two ounces, for example, would cost \$0.699 per ballot. These estimated costs are for San Diego County *alone*. Thus the anticipated cost throughout the state is a far cry from the modest \$10,000 cited in the *Kern High School District* case.

Accordingly, the County respectfully requests the Commission reconsider its proposed conclusion regarding special elections and include special elections within the purview of the reimbursable state mandate.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my personal knowledge, information and belief.

THOMAS E. MONTGOMERY, County Counsel

By: 

CHRISTINA SNIDER, Senior Deputy

the report “County of San Diego Registered Voters and Vote by Mail Ballot Voter Turnout,” also available at

https://www.sdvote.com/content/dam/rov/en/reports/voter_turnouts.pdf.

³ Exhibit C to San Diego County’s comments on the test claim, page 1.

EXHIBIT F

County of San Diego Registered Voters and
Vote by Mail Ballot Voter Turnout

| Date | Election Title | Registered Voters | Total Voted Election | % of Turnout | Absentee Issued | Absentee Voted* | % of AV Voted | Absentee % of Total Votes Cast | Requested Absentee Issued* | Requested Absentee Voted* | % of AV Voted* | Declared Absentee Issued | Declared Absentee Voted | % of AV Voted | Perm Absentee Issued | Perm Absentee Voted | % of Perm AV Voted |
|-----------|--|-------------------|----------------------|--------------|-----------------|-----------------|---------------|--------------------------------|----------------------------|---------------------------|----------------|--------------------------|-------------------------|---------------|----------------------|---------------------|--------------------|
| | * Mail Ballot Election (no polls) | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| 6-Nov-18 | Gubernatorial General Election | 1,767,300 | 1,173,924 | 66.42% | 1,297,557 | 804,269 | 61.98% | 68.51% | 36,591 | 22,888 | 62.55% | 42,866 | 26,638 | 62.14% | 1,218,100 | 733,280 | 60.20% |
| 5-Jun-18 | Gubernatorial Primary Election | 1,693,774 | 673,640 | 39.77% | 1,143,276 | 476,173 | 41.65% | 70.69% | 23,557 | 8,728 | 37.05% | 45,609 | 19,109 | 41.90% | 1,074,110 | 447,763 | 41.69% |
| 24-Apr-18 | * Rancho Santa Fe School Dist. Special Vacancy | 4,321 | 1,139 | 26.36% | 4,354 | 1,139 | 26.16% | 100.00% | | | | | | | | | |
| 7-Nov-17 | City of Poway Special Municipal Election | 29,318 | 12,104 | 41.29% | 19,517 | 9,121 | 46.73% | 75.36% | 389 | 151 | 38.82% | 103 | 37 | 35.92% | 19,025 | 8,931 | 46.94% |
| 30-Jun-17 | * Permanent Rd Div. Zone No. 117-Legend Rock | 103 | 77 | 74.76% | 103 | 77 | 74.76% | 100.00% | | | | | | | | | |
| 2-May-17 | * County Retirement Board (2nd Seat General Member) | 11,489 | 4,473 | 38.93% | 11,489 | 4,473 | 38.93% | 100.00% | | | | | | | | | |
| 15-Nov-16 | * County Retirement Board Safety (7th & Alternate) | 3,541 | 1,281 | 36.18% | 3,541 | 1,281 | 36.18% | 100.00% | | | | | | | | | |
| 8-Nov-16 | Presidential General | 1,652,875 | 1,346,513 | 81.46% | 1,118,788 | 856,937 | 76.60% | 63.64% | 51,787 | 43,438 | 83.88% | 50,811 | 40,023 | 78.77% | 1,016,190 | 772,363 | 76.01% |
| 7-Jun-16 | Presidential Primary | 1,523,251 | 775,930 | 50.94% | 972,021 | 490,560 | 50.47% | 63.22% | 21,590 | 12,690 | 58.78% | 47,142 | 22,404 | 47.52% | 903,289 | 454,915 | 50.36% |
| 3-May-16 | * County Retirement Board (3rd) | 14,186 | 4,569 | 32.21% | 14,186 | 4,569 | 32.21% | 100.00% | | | | | | | | | |
| 23-Feb-16 | City of Carlsbad Special Municipal Election | 63,265 | 39,465 | 62.38% | 42,038 | 27,632 | 65.73% | 70.02% | 947 | 634 | 66.95% | 10 | 5 | 50.00% | 41,081 | 26,989 | 65.70% |
| 26-Jan-16 | * Yuima Municipal Water Dist.- No. 2 | 128 | 62 | 48.44% | 128 | 62 | 48.44% | 100.00% | | | | | | | | | |
| 4-Nov-14 | Governor General | 1,546,924 | 692,434 | 44.76% | 869,455 | 449,796 | 51.73% | 64.96% | 16,164 | 8,636 | 53.43% | 40,678 | 19,386 | 47.66% | 812,613 | 421,574 | 51.88% |
| 3-Jun-14 | Governor Primary | 1,544,841 | 420,700 | 27.23% | 858,745 | 306,986 | 35.75% | 72.97% | 12,750 | 4,259 | 33.40% | 38,869 | 11,647 | 29.96% | 807,126 | 291,033 | 36.06% |
| 6-May-14 | * County Retirement Board (2nd Seat General Member) | 13,896 | 4,845 | 34.87% | 13,896 | 4,845 | 34.87% | 100.00% | | | | | | | | | |
| 11-Feb-14 | Special Consolidated-City of San Diego/Solana Beach | 675,793 | 294,491 | 43.58% | 356,225 | 195,616 | 54.91% | 66.43% | 9,418 | 4,341 | 46.09% | 5,787 | 2,491 | 43.04% | 341,020 | 188,677 | 55.33% |
| 19-Nov-13 | * County Retirement Board Safety (7th) | 3,459 | 1,013 | 29.29% | 3,459 | 1,013 | 29.29% | 100.00% | | | | | | | | | |
| 19-Nov-13 | City of San Diego Special Municipal Election | 683,370 | 242,747 | 35.52% | 367,766 | 165,273 | 44.94% | 68.08% | 3,355 | 2,978 | 88.76% | 6,223 | 2,088 | 33.55% | 353,084 | 159,441 | 45.16% |
| 18-Jun-13 | City of Encinitas Special Municipal Election | 39,858 | 12,888 | 32.33% | 22,684 | 9,558 | 42.14% | 74.16% | 529 | 213 | 40.26% | 154 | 58 | 37.66% | 22,001 | 9,287 | 42.21% |
| 21-May-13 | Special Cons. - 80th Assembly Dist/SD City Council #4 | 225,675 | 35,486 | 15.72% | 114,297 | 28,930 | 25.31% | 81.53% | 1,656 | 293 | 17.69% | 591 | 64 | 10.83% | 112,050 | 28,577 | 25.50% |
| 21-May-13 | * County Retirement Board (3rd) | 13,338 | 4,116 | 30.86% | 13,338 | 4,116 | 30.86% | 100.00% | | | | | | | | | |
| 26-Mar-13 | Municipal Special Election - SD City Council District 4 | 66,497 | 13,406 | 20.16% | 34,595 | 9,817 | 28.38% | 73.23% | 574 | 121 | 21.08% | 685 | 90 | 13.14% | 33,336 | 9,606 | 28.82% |
| 12-Mar-13 | Special Primary Election - State Senate 40th District | 244,150 | 36,664 | 15.02% | 125,857 | 31,026 | 24.65% | 84.62% | 2,107 | 314 | 14.90% | 1,267 | 259 | 20.44% | 122,483 | 30,453 | 24.86% |
| 6-Nov-12 | Presidential General | 1,563,093 | 1,203,265 | 76.98% | 882,758 | 675,007 | 76.47% | 56.10% | 32,807 | 29,001 | 88.40% | 41,958 | 30,945 | 73.75% | 798,020 | 607,145 | 76.08% |
| 5-Jun-12 | Presidential Primary | 1,465,269 | 548,462 | 37.43% | 751,330 | 360,523 | 47.98% | 65.73% | 16,942 | 10,767 | 63.55% | 44,108 | 17,776 | 40.30% | 690,280 | 331,877 | 48.08% |
| 24-Apr-12 | * County Retirement Board (3rd) | 13,073 | 2,290 | 17.52% | 13,073 | 2,290 | 17.52% | 100.00% | | | | | | | | | |
| 17-May-11 | * County Retirement Board (2nd & 8th Alternate) | 26,147 | 9,156 | 35.02% | 26,149 | 9,156 | 35.01% | 100.00% | | | | | | | | | |
| 23-Nov-10 | * County Retirement Board Safety (7th) | 3,273 | 1,047 | 31.99% | 3,273 | 1,047 | 31.99% | 100.00% | | | | | | | | | |
| 2-Nov-10 | Governor General | 1,442,161 | 926,363 | 64.23% | 727,577 | 510,175 | 70.12% | 55.07% | 34,017 | 25,046 | 73.63% | 40,042 | 25,680 | 64.13% | 653,518 | 458,951 | 70.23% |
| 8-Jun-10 | Governor Primary | 1,416,273 | 538,551 | 38.03% | 685,873 | 349,925 | 51.02% | 64.98% | 17,222 | 8,331 | 48.37% | 34,725 | 14,365 | 41.37% | 633,926 | 327,097 | 51.60% |
| 18-May-10 | * County Retirement Board (3rd) | 13,809 | 5,036 | 36.47% | 13,809 | 5,036 | 36.47% | 100.00% | | | | | | | | | |
| 8-Dec-09 | City of Oceanside Special Municipal Recall | 75,017 | 25,194 | 33.58% | 34,125 | 18,390 | 53.89% | 72.99% | 1,312 | 862 | 65.70% | 882 | 334 | 37.87% | 31,931 | 17,196 | 53.85% |
| 25-Aug-09 | * Rainbow Municipal Water Dist. Special Mail Ballot Election | 11,604 | 4,773 | 41.13% | 11,635 | 4,773 | 41.02% | 100.00% | | | | | | | | | |
| 19-May-09 | Statewide Special Election | 1,474,331 | 463,863 | 31.46% | 628,303 | 308,146 | 49.04% | 66.43% | 21,214 | 11,387 | 53.68% | 32,200 | 11,740 | 36.46% | 574,889 | 285,122 | 49.60% |
| 5-May-09 | * City of Chula Vista Special Mail Ballot Election | 104,717 | 29,704 | 28.37% | 105,060 | 29,704 | 28.27% | 100.00% | | | | | | | | | |
| 4-Nov-08 | Presidential General | 1,488,157 | 1,245,947 | 83.72% | 668,377 | 573,169 | 85.76% | 46.00% | 66,093 | 57,103 | 86.40% | 35,834 | 27,938 | 77.97% | 566,450 | 486,422 | 85.87% |
| 26-Aug-08 | * Special/Tri-City Healthcare District | 141,001 | 52,965 | 37.56% | 142,350 | 52,965 | 37.21% | 100.00% | | | | | | | | | |
| 3-Jun-08 | Direct Primary | 1,369,496 | 465,489 | 33.99% | 516,738 | 281,513 | 54.48% | 60.48% | 19,891 | 12,215 | 61.41% | 31,521 | 10,965 | 34.79% | 465,326 | 258,028 | 55.45% |
| 20-May-08 | * County Retirement Board (2nd & 8th Alternate) | 27,453 | 9,704 | 35.35% | 27,453 | 9,704 | 35.35% | 100.00% | | | | | | | | | |
| 6-May-08 | * Special/ County Service Area No.112-Campo | 842 | 314 | 37.29% | 869 | 314 | 36.13% | 100.00% | | | | | | | | | |
| 5-Feb-08 | Presidential Primary | 1,313,725 | 797,043 | 60.67% | 509,722 | 360,371 | 70.70% | 45.21% | 36,406 | 26,190 | 71.94% | 30,386 | 17,522 | 57.66% | 442,930 | 315,748 | 71.29% |
| 11-Dec-07 | * Potrero Com. Planning Area Mail Ballot Recall | 507 | 299 | 58.97% | 528 | 299 | 56.63% | 100.00% | | | | | | | | | |
| 25-Sep-07 | * Special / East County/Pine Valley FPD's | 6,023 | 2,310 | 38.35% | 6,062 | 2,310 | 38.11% | 100.00% | | | | | | | | | |

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On May 28, 2020, I served the:

- **Claimant’s Comments on the Draft Proposed Decision filed May 27, 2020**
- **County of San Diego’s Comments on the Draft Proposed Decision filed May 27, 2020**

Vote by Mail Ballots: Prepaid Postage, 19-TC-01
Elections Code Section 3010; Statutes 2018, Chapter 120 (AB 216)
County of Los Angeles, Claimant

By making it available on the Commission’s website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on May 28, 2020 at Sacramento, California.

Lorenzo Duran

Lorenzo Duran
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814
(916) 323-3562

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 5/6/20

Claim Number: 19-TC-01

Matter: Vote by Mail Ballots: Prepaid Postage

Claimant: County of Los Angeles

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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