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October 20, 2021
Commission on
State Mandates

County of San Diego

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October 20, 2021

Via Drop Box

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RE: Claimant's Comments on Proposed Decision
Extended Conditional Voter Registration, 20-TC-02

Dear Ms. Halsey:

This letter provides Claimant's comments on the Commission's Proposed Decision.

I. SB 72 Did not Merely Increase the Costs of Providing CVR; it Expanded the CVR Program. That Creates a New Program or Higher Level of Service.

The Commission acknowledges that SB 72 expanded county election officials' preexisting duties. (Proposed Decision, Executive Summary at 4 (SB 72 "extend[ed] the requirement" to provide CVR to all satellite offices and polling places in the county; SB 72 "expands the locations" where these services must be provided); Proposed Decision at 7 (SB 72 "extend[s] the requirement" to provide CVR services and "expands the locations" where these services are required; 42 (county elections officials now must perform CVR duties "at more locations"); *id.* at 8 (SB 72 "expand[ed] the locations where CVR services must be provided); *id.* at 27 (same); *id.* at 37 (same); *id.* at 42 (SB 72 must now provide CVR "at more locations").)

However, in the Proposed Decision, the Commission concludes that because elections officials were already required to conduct the "actual activities" of providing CVR services prior to SB 72, the fact that elections officials now have to do so in new locations for longer periods of time is *not* a new program or higher level of service. (Proposed Decision at 7-8, 27, 37, 39, 42.) Rather, according to the Commission, the State merely increased the costs of counties providing the same services they previously had to provide. Claimant respectfully disagrees.

A. A New Program or Higher Level of Service Means a New or "Enhanced Service" Unique to Government for the Provision of Public Services.

A statute creates a "program" when it creates: "[1] programs that carry out the governmental function of providing services to the public, or [2] laws which, to implement a state policy, impose unique requirements on local governments and do not apply generally to all residents and entities in the state." *County of Los Angeles v. State of California*, 43 Cal. 3d 46, 56 (1987). A program is "new' if the local governmental entity had not previously been required to institute it." *County of Los Angeles v. Comm'n on State Mandates*, 110 Cal. App. 4th 1176, 1189 (2003).

A "higher level of service" means an "increase[] in the services provided by local agencies in existing 'programs.'" *County of Los Angeles*, *supra*, 43 Cal. 3d at 56. A higher level of service exists when: (i) the requirements [in the law] are new in comparison with the preexisting scheme in view of the circumstance that they did not exist prior to the enactment of [the law]; and (ii) the requirements were intended to provide an enhanced service to the public…." *San Diego Unified Sch. Dist. v. Comm'n on State Mandates*, 33 Cal. 4th 859, 878 (2004).

B. A Statute Imposes Only "Higher Costs" when there is no Government Program or Specific Public Service, which is not the Case Here.

The cases in which courts have found that a mandate only resulted in increased costs to the local governments—and not a new program or higher level of service—involved mandates that (1) applied to the private and public sector alike and only incidentally impacted local government, or (2) had the effect of governments paying additional compensation to their government employees. *E.g.*, *City of Richmond v. Commission on State Mandates*, 64 Cal. App. 4th 1190, 1196 (1998); *City of Anaheim v. State*, 189 Cal. App. 3d 1478 (1987); *County of Los Angeles*, *supra*, 43 Cal. 3d at 46. Critically, the statutes in those cases did *not* require that governments provide expanded services to the public (though SB 72 does).

In *City of Richmond*, the statute at issue required local governments to pay an increased death benefit to local safety officers. 64 Cal. App. 4th at 1194. The court held that this was merely an increased internal cost to the government, not an increased cost to provide a higher level of service to the public. The court explained that: "A higher cost to the local government for compensating its employees is not the same as a higher cost of providing services to the public." *Id.* at 1196. The former is not an unfunded mandate; the latter is. *Id.* at 119-98.

In *City of Anaheim*, the statute at issue required a state agency (PERS) to increase pension payments to retired public employees. 189 Cal. App. 3d at 1482. Local governments had no control over the pension payments, and the statute did not require them to do anything. *Id.* However, the change had an incidental effect on the City of Anaheim because the resulting transfer of funds between accounts caused the City to increase its contributions to employee salaries. *Id.* at 1482-1483. The Court of Appeal held that the law imposed requirements on the state but only had an incidental effect on local governments. *Id.* at 1483. Further, the Court explained the City's increased contributions to employee salaries were not a service to the public—they were merely a higher cost of the City compensating its own employees. *Id.* at 1484. As later explained by the Supreme Court of California, "[t]he law increased the cost of employing public servants, but it did not in any tangible manner increase the level of service provided by those employees to the public." *San Diego Unified School Dist.*, 33 Cal. 4th at 875.

In *County of Los Angeles*, the statute at issue required local governments to provide the same level of workers' compensation benefits that private employees received. 43 Cal. 3d at 57-58. The Court held that a statute of general application that had a mere incidental effect on local governments was not a reimbursable mandate. *Id.* at 57 ("The language of section 6 is far too vague to support an inference that it was intended that each time the Legislature passes a law of general application it must discern the likely effect on local governments and provide an appropriation to pay for any incidental increase in local costs.")

Here, the Commission in its Proposed Decision concludes that SB 72 only imposes higher costs on the counties. To support its conclusion, the Commission cites *City of Richmond* and other cases that repeat the general rule that mere higher costs are not reimbursable. (Proposed Decision at 37, fns. 175-76.) But the rationale behind that rule does not apply to the duties imposed by SB 72. SB 72 does not require that government employees be paid more, and SB 72 is not a law of statewide application that has only an incidental effect on local government.

Rather, SB 72 expressly requires local governments to provide additional services to the public. That was expressly not true in the cases above. *City of Anaheim*, 189 Cal. App. 3d at 1484; *County of Los Angeles*, 43 Cal. 3d at 58 ("Workers' compensation is not a program administered by local agencies to provide service to the public"); *City of Richmond*, 64 Cal. App. 4th at 1196 (paying employees more benefits is not a "peculiarly local government function"; "[a] higher cost to the local government for compensating its employees is not the same as a higher cost of providing services to the public.")

The *City of Richmond* line of cases and the rationale therein simply does not apply to this test claim.

Further, the Commission cites no case supporting the Commission's broad conclusion that simply because a local government was already providing some services and now has to *expand* those services, that requirement amounts in only "higher costs." Nor does the case law support this conclusion. In fact, the opposite is true, as discussed immediately below.

C. A Statute Imposes a New Program or Higher Level of Service when it Requires Counties to Offer "Expanded" Services, which is the Case Here.

In contrast to merely imposing a "higher costs," when a statute requires that a local government must provide an "expanded" version of a service it is already providing to the public (as is true here), this is a reimbursable mandate. That is because the increased costs are not merely an incidental effect of a law of general application. Rather, the increased costs are borne by the local government in order to provide expanded services to the public.

For example, in *Carmel Valley Fire Protec. Dist. v. State of California*, 190 Cal. App. 3d 521, 537–38 (1987), the Court held that a requirement in an executive order to provide "updated equipment" to firefighters was a reimbursable mandate. The Court emphasized that fire protection is an essential and basic function of local government. *Id.* at 537. Thus the updated equipment was necessary for the government to better provide that service. *See San Diego Unified Sch. Dist.*, *supra*, 33 Cal. 4th at 877 ("Because this increased safety equipment apparently was designed to result in more effective fire protection, the mandate evidently was intended to produce a higher level of service to the public….")

In *Carmel Valley*, the local governments were already providing firefighting services to the public—and certainly were already using some equipment (hence the mandate to provide "updated" equipment). But the Court held that the requirement to *update* the equipment was a "new program" under Section 6.[1] Thus this additional mandated cost that the local governments incurred in order to provide basic government services was reimbursable. *Carmel Valley*, 190 Cal. App. 3d at 537.

[1] Although the court also analyzed the statutory language of the Revenue & Taxation Code—which were the governing statutes at the time of the decision—the court based its decision on Section 6 and the language in *County of Los Angeles* interpreting Section 6. *Carmel Valley Fire Protec. Dist.*, 190 Cal. App. 3d at 537–38.

The Supreme Court of California honed in on the distinction between "higher costs" and a "higher level of service" in *San Diego Unified Sch. Dist.*, *supra*, 33 Cal. 4th at 878. In that case, the statute at issue required schools to expel students under certain circumstances. 33 Cal. 4th at 868-69. The Supreme Court of California held that the schools' new duties to provide mandatory hearings constituted a higher level of service. *Id.* at 878-89. This was because the requirements did not exist prior to the statute, the mandate applied uniquely to public schools, and because enhancing the safety of the students was a service to the public. *Id.* at 879. In its discussion, the Court distinguished other cases in which Courts of Appeal found that statutes did not impose mandates when the statutes imposed universal requirements on private employers and local governments alike. *Id*. (citing *County of Los Angeles*, *supra*, and *City of Sacramento v. State of California*, 50 Cal. 3d 51 (1990).) The Supreme Court explained that simply because a state law increases the costs borne by local government in providing services, that does not automatically render the law a reimbursable mandate. *Id.* at 876. However, the Supreme Court contrasted such laws with statutes that impose an "increase in the actual level or quality of governmental services provided," which *do* impose reimbursable mandates. *Id.* at 877.

A recent Court of Appeal decision also highlighted this distinction. *Dep't. of Fin. v. Comm'n. on State Mandates*, 59 Cal. App. 5th 546 (2021) (*Dep't of Fin.*). In *Dep't. of Fin.*, the County of Los Angeles historically provided stormwater drainage and flood control services. A new Regional Board stormwater permit mandated the installation and maintenance of trash receptacles at transit stops, and the inspection of facilities to ensure compliance. *Id.* at 558. The court held that even though the County already provided stormwater drainage and flood control services, the new requirements imposed a "higher level of service" because they reduced pollution and increased compliance. *Id.* at 558. The court held that alternatively, the requirements were a new program because they provided a government service that was not mandated prior to the permit. *Id.* at 559.

Here, SB 72 increased the "actual level or quality" of county election officials' preexisting CVR duties by expanding the dates and locations on which these services must be offered. *San Diego Unified Sch. Dist.*, *supra*, 33 Cal. 4th at 877. This increased service constitutes a "new program" because the requirements to offer CVR in polling places and at satellite locations during the 14-day period prior to the election and on election day were new and provided a uniquely governmental service.

But certainly, *at the very least*, the counties' "expanded" duties under SB 72 constitute a "higher level of service" because they were new in comparison to the counties' prior level of service, and were intended to provide an enhanced service to the public. *San Diego Unified Sch. Dist.*, 33 Cal. 4th at 878.

As Claimant explained in the test claim, the author of SB 72 stated that he proposed the bill to provide various public services related to voting, including: 1) increased voter turnout, 2) elimination of arbitrary deadlines to register when voters are most interested in voting, 3) remedying inaccurate voter rolls, 4) assisting geographically mobile, lower-income citizens, young voters, and voters of color, and 5) allowing voters registered as "no party preference" who are unable to vote in the primary election for certain parties to change their registrations shortly before the primary election so that they can vote in those primary elections. Sen. Comm. on Elections and Constitutional Amendments (April 2, 2019), Background to SB 72, pp. 6-7.[2] The author noted that even though CVR was already available on election day at the election officials' offices, as a practical matter very few potential voters took advantage of that limited option, and "those who were able to make the trip to their county elections office waited hours in line in order to register and cast a ballot." *Id.* at p. 8.[3] Thus the amendment to Section 2170(d)(1) was proposed and enacted in order to expand voter services and voting, which is a traditional governmental function and service.

Indeed, the rationale Commission's Proposed Decision would render meaningless the "higher level of service" category of reimbursable costs articulated in Section 6. The logical conclusion of the Commission's ruling is that any time a local government has a preexisting duty that was later expanded or increased by statute, that statute does not create a reimbursable mandate but only imposes non-reimbursable increased costs. If such a statute does not create a "higher level of service," then what would? What does "higher level of service" mean if it does not mean *extended*—albeit *preexisting*—services?

The Supreme Court of California has defined this term as a requirement "to provide an **enhanced service** to the public." *San Diego Unified Sch. Dist.*, 33 Cal. 4th at 878 (emphasis added). SB 72 meets that definition. SB 72 newly requires counties to provide CVR at expanded times and locations. This is a quintessential higher level of service. It meets the definition of a new program as well. The counties' costs to implement this mandate should be reimbursed.

II. The Costs of the Satellite Locations Should Be Reimbursed.

Claimant respectfully disagrees with the Commission's conclusion that if a statute does not expressly mandate the conduct of specific activities, then those activities are not

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[2] Exhibit J, also available at http://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201920200SB72.

[3] *Id.*

"mandated" within the meaning of Section 6. Thus Claimant contents the satellite locations were necessitated by SB 72, and the cost to open those locations should be borne by the State.

However, Claimant has already articulated arguments on this point in prior briefing. Accordingly, Claimant will not belabor those arguments here. Claimant reserves the right to seek reimbursement for the satellite locations as "reasonably necessary" at the Parameters & Guidelines stage, if Claimant's test claim is approved.

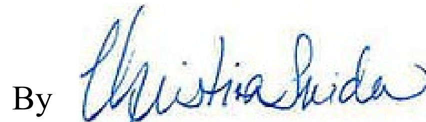
II. Conclusion

Claimant respectfully requests the Commission approve its test claim in its entirety.

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 or belief.

Very truly yours,

LONNIE J. ELDRIDGE, County Counsel

By 
CHRISTINA SNIDER, Senior Deputy

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.

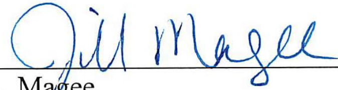
On October 22, 2021, I served the:

- **Claimant's Comments on the Draft Proposed Decision filed October 20, 2021**

  Extended Conditional Voter Registration, 20-TC-02
  Elections Code Section 2170 as Amended by Statutes 2019, Chapter 565 (SB 72)
  County of San Diego, 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 October 22, 2021 at Sacramento, California.



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COMMISSION ON STATE MANDATES

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Last Updated: 9/15/21

Claim Number: 20-TC-02

Matter: Extended Conditional Voter Registration

Claimant: County of San Diego

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