

April 17, 2020

Mr. Michael Vu
Registrar of Voters
P.O. Box 85656
San Diego, CA, 92186-5656

RE: Recommendations for California's November 2020 Elections

Dear Mr. Vu:

On behalf of Alliance San Diego, a community empowerment organization with a base of more than 110,000 voters representing marginalized communities in the San Diego region, we are grateful and supportive of the work you've done to increase access, protect voting rights, and include traditionally underrepresented communities in finding solutions to improve voter turnout across the county.

I am writing today to express our concern regarding the ability of vulnerable voters in marginalized communities across the region to participate in the upcoming November General Election. The COVID-19 pandemic and our response as a state has presented a number of huge challenges to the democratic and governing process. These challenges also present an opportunity for big structural change to improve our election and voting systems. California can show national leadership and lead the way, particularly on issues at the core of our democracy like voting. We know we get better decisions when more people vote and we must be prepared to make reforms that allow for high voter participation, even in the midst of a crisis. We also know that while communities across the state have had to face this crisis head on, the pandemic has disproportionately affected the communities we serve, including communities of color, immigrant communities, young people, people with disabilities, and the housing insecure. The risk to these communities, our most vulnerable communities, would be disenfranchisement, if the reforms fall short.

It is in this light that we have expressed strong opposition to the current recommendations of the COVID-19 November Election Working Group, which threaten to disenfranchise infrequent voters. The idea that an election as large and important as the 2020 November General can be conducted absent requirements for a minimum of in-person locations and ballot drop off locations, ignores the history and hardship associated with these vulnerable communities in the electoral process. We believe that such a waiver of the current in-person and drop-off location voting without strong minimum standards for in-person and drop off location voting abdicates the State's leadership, as well as its responsibility, to establish a system where voters will have equal access and opportunity to participate no matter who they are and/or where they live. The current recommendations threaten to

disenfranchise infrequent voters, many of whom only trust in and depend on in-person voting or ballot drop-off to vote.

In short, we advocate that any reforms to the 2020 November General Election must uphold the following three principles:

1. **Protect Access:** The rights of infrequent voters including young people, communities of color, low-income, and the homeless are fully protected and their options for voting are expanded to include mail, in-person, drop-off ballot voting and expanded voting periods.
2. **Mass Public Education:** Infrequent voters are fully educated and informed about any shifts in the voting model and their options to cast their ballot.
3. **Equity:** Equity is centered in implementation, including a) education and outreach, b) in-person voting location placement, c) in-language access, d) support for elderly and disabled voters, and e) preparation for a surge in low-income/low-propensity voters.

Specifically, we call on your leadership to help ensure that:

1. **County Election Officials must mail every registered voter in California a Vote-By-Mail ballot in every county in the State, including Los Angeles County.** Amid the COVID-19 pandemic, it is more imperative than ever that voters are given additional options to cast a ballot in order to increase physical distancing and avoid long lines at the polls.
2. **All County Election Officials must maintain existing legal standards for in-person voting as required by the Voters Choice Act (Election Code § 4005) and for those jurisdictions conducting elections via the precinct model (Elections Code § 12200 et seq.).** In short, County Election Officials must prepare for an influx of voters in the November Election.

In short, County Election Officials must prepare for an influx of voters in the November Election. Every indication to date, including the last states to vote as we entered the crisis, are that the public has a heightened, not diminished, interest in this election and in public issues. It is premature to predict negative impacts on November voter turnout. There is very good reason to believe that voters will be more motivated than ever to vote this November, because this crisis has clarified to every single voter the importance of participating in the political process. They are now acutely aware that policy decisions made by our elected leaders can make the difference between life and death for themselves and their families. Therefore, the

State and County Election Officials must be prepared for an influx of voters on and near Election Day. Mailing every voter a VBM ballot simply will not suffice in processing the number of voting transactions that counties will likely receive in the November Election cycle. In addition, County Election Officials must maintain in-person voting options for two additional reasons:

- While 70% of registered voters in CA are registered as Permanent VBM voters, many Permanent VBM voters tend to either return their ballot by drop-box or drop-off location, or by returning their ballot to a vote center or polling location. Removing in-person voting options threatens to cause confusion and disenfranchise these voters.
- The lack of in-person voting options will cause disenfranchisement of voters who: a) need a replacement ballot for any reason, b) need in-person language or physical assistance, c) do not have an address to receive a vote-by-mail ballot, d) never hear or learn about the shifts to a new, all vote-by-mail model, e) new to voting and need in-person assistance, f) want to register and vote on the same-day, and g) simply do not trust in the mail to deliver their ballot

3. **County Election Officials must think creatively about maintaining in-person voting options in their counties.** If needed, Counties should convert county government facilities (such as DMV offices) to serve as vote locations and require government employees to serve as poll workers. Counties should consider expanding drive-through voting and curbside voting. These options will increase voters' ability to adhere to physical distancing guidelines while still casting a ballot in-person. Election Officials must also think creatively about the types of locations they use to serve as polling locations. Facilities that should be considered include outdoor locations, parking lots and garages, and grocery stores.
4. **The State and County Election Officials must prepare to coordinate and deliver a mass public education campaign, in conjunction with community-based organizations,** to ensure voters:
 - a. Know about any changes to the November election model,
 - b. Identify their language preference prior to VBM ballot mailings, and
 - c. Know how and where to cast a ballot, whether by mail, dropbox, or in-person

30% of the State's registered voters are not Permanent VBM voters. They also tend to come from traditionally underrepresented communities. Failing to educate and inform these voters about changes to the way that they exercise their fundamental right to vote will simply fuel the

distrust of government that already exists in these communities. There should be additional investment in these communities, particularly in areas where there were significant issues during the March Primary election to rebuild community trust in the electoral process.

Community-based organizations are often experts at reaching members of the communities they serve and can be helpful in determining funding levels, targets, strategies, and tactics. County election officials should consult and coordinate with organizations in their counties to help inform their public education strategy and campaigns. State and County voter education campaigns should include:

- a. Signage at traditional polling locations that are closed in November to redirect voters to the closest open location,
- b. An Amber alert type notification system that promotes early voting to all California residents, and
- c. Declaring the 4 days prior to Election Day a State Week of Recognition to increase voter awareness and declaring Election Day as a State Holiday for non-essential state employees.

5. **County Election Officials must prioritize the health and safety of both voters and poll workers by establishing and implementing robust health and safety protocols, in consultation with state and local health officials, and ensuring adequate staff capacity at in-person voting locations.** County Election Officials should increase pay for poll workers and think creatively about how to staff in-person polling locations and vote centers. Election officials should coordinate with state and local volunteer corps and recruit from among the pool of recently unemployed California workers to ensure staff capacity will meet the demands of the November election. We support additional funding for recruiting poll workers, including paying “hazard” wages to those workers who agree to work at voting locations. County Election Officials should also train poll workers in sanitation, line management, and physical distancing tactics to ensure the health and safety of both poll workers and voters alike. Line management tactics should include:
 - a. A digital app that tracks voting location wait times and gives voters real-time updates,
 - b. Opportunities to schedule appointments to vote,
 - c. Ticket dispenser systems that allow voters to social distance while waiting to vote, and
 - d. Specific hours dedicated for seniors to vote.

6. **County Election Officials must either maintain or increase current levels of in-person early voting options up to 2 weeks prior to Election Day.** Early voting will help to avoid long lines and assist poll workers in maintaining physical distancing and sanitation practices at voting locations.

7. **The State and County Election Officials must expand voter assistance programs and resources,** including phone and online hotline assistance, in-person and online language and disability accessibility, and opportunities to request and obtain replacement ballots beyond going to a registrar's main office. Changes to the State's election model will require additional assistance for traditionally underrepresented voters, including new voters, houseless voters, low-income voters, voters who need language assistance, voters with disabilities, and infrequent voters. The State and County Election Officials should be ready, willing, and able to meet their needs.

In closing, we know that this is a time of crisis and while we must rethink the basic working of our society, we cannot allow our democratic process to suffer. We thank you again for your leadership and stewardship of the electoral process in San Diego County. We urge you to exercise leadership once again to strengthen our democracy at one of its most fragile moments. Please consider our concerns and carry them forward to the working group. You can act and impart your influence to achieve the desired impact on California and our region!

Respectfully submitted,

Christopher Rice-Wilson
Associate Director
Alliance San Diego / Alliance San Diego Mobilization Fund

CC: Alex Padilla (California Secretary of State)