January 7, 2020

The Honorable Cecilia Aguiar-Curry  
Chair, Assembly Local Government Committee  
State Capitol  
Sacramento, CA 95814

RE: Assembly Bill 315 (C. Garcia) – Oppose [As Amended January 6, 2020]  
Hearing Date: January 15, 2020 – Assembly Local Government Committee

Dear Assembly Member Aguiar-Curry:

The undersigned organizations are respectfully opposed to Assembly Bill 315, which would place new burdensome restrictions and reporting requirements specifically on public agency advocacy organizations.

Public agency advocacy organizations primarily rely on membership dues to fund grassroots advocacy programs, legal advocacy programs, educational activities as well as state and federal legislative and regulatory advocacy. AB 315 would effectively limit or end a majority of these programs, significantly depriving public agency officials from understanding complex policy issues and finding ways to collaborate on best practices on a variety of public policy issues.
It is difficult to overstate the impact this measure would have on the multitude of services provided by public agency organizations. A non-exhaustive list of local public agency association practices this measure would impact by not allowing expenditures for any purpose, including travel, other than for conferences, gatherings, or educational activities includes:

- Regional field coordination – individuals located throughout the state are employed for both logistical reasons as well as fostering regional coordination/cooperation and ensuring diverse views are represented. Given the sheer size, complexity and diversity that make up California’s public agencies, it is incredibly important that we provide frequent opportunities for local officials to come together to learn about emerging policy trends, to discuss approaches to solving and advocating for local issues.

- Regulatory advocacy – the State and many local agencies depend on public agency associations to advocate on behalf of their membership with regard to the development of, updates to, and elimination of state and local regulations and ordinances.

- Public agency financing – access to grants, loans, scholarships, or other means of financing for local public agency association members for infrastructure, staff professional development, and workshops meant to deepen an understanding of highly-technical issues.

- Public awareness/education campaigns – long-running efforts to educate the public about resources and tools available to them that are offered by their public agencies. Ensuring that Californians are aware of and have access to any public agency resources at their disposal is of utmost importance.

- Legal resources – guidance to local public agencies regarding best practices, statutory and/or legal requirements, and other legal questions.

Our organizations take pride in providing a service to the Legislature serving as technical experts and providing the Governor, regulatory bodies, and legislative staff with educational resources on all issues impacting municipal government. It is critical that public agencies have a seat at the table through the membership organizations. We are deeply concerned about the unintended consequences that AB 315 will have on our organization’s ability to effectively educate policy makers on municipal government positions.

While we understand the incident that prompted you to introduce this measure (as detailed in your July 9, 2019 public statement), it should be noted that the reported incident took place outside of any sanctioned public agency association related event. **AB 315 would not have prevented this incident from occurring.** However, if enacted AB 315 will unilaterally apply and have material impacts on organizations representing city, county, special district, education, energy, water, police, fire, healthcare, and other statewide public agency advocacy organizations—and by extension the entities themselves.

Many of the organizations that would be impacted by this measure have been in existence for well over 100 years. Throughout this period, we have worked responsibly to engage federal and state government officials in a respectful and collaborative manner. As such, we believe that this measure is unwarranted.
Should you have any questions, please feel free to contact any of the representatives listed below.

Sincerely,

Dillon Gibbons
Senior Legislative Representative
California Special Districts Association

Bijan Merhyar
Legislative Representative
League of California Cities

Geoffrey Neill
Legislative Representative
California State Association of Counties

Jean Kinney Hurst
Legislative Advocate
Urban Counties of California

Amber King
Vice President, Advocacy & Membership
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Nancy Chaires Espinoza
Legislative Advocate
California Assn for Adequate School Housing

Jacklyn Montgomery
Executive Director
California Assn for Coordinated Transportation

Paul Smith
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Danielle Blacet-Hyden
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Faith Lane Borges
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California Association of Joint Powers Authorities

Karen Keeslar
Executive Director
California Association of Public Authorities for IHSS

CC: The Honorable Christina Garcia
    Members, Assembly Local Government Committee
    Jimmy MacDonald, Consultant, Assembly Local Government Committee
    William Weber, Consultant, Assembly Republican Caucus