



COUNTY OF YOLO

ELECTIONS OFFICE

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JESSE SALINAS
REGISTRAR OF VOTERS



Public Comments

Printouts of emails and transcribed comments from meetings will be added in this section throughout the public consultation and review process.



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January 20, 2022

Submitted via email (elections@yolocounty.org)

Jesse Salinas
Assessor, Clerk-Recorder, and Registrar of Voters
County of Yolo
625 Court Street, Room B-05
Woodland, CA 95695

Re: Comments on Yolo County's Draft EAP

Dear Mr. Salinas:

Disability Rights California (DRC) appreciates the opportunity to comment on Yolo County's draft Election Administration Plan (EAP), which is dated December 2021 and was posted online for public comment on January 10, 2022. DRC is the protection and advocacy system for Californians with disabilities. Under the Help America Vote Act of 2002, DRC is charged with ensuring "the full participation in the electoral process for individuals with disabilities, including registering to vote, casting a vote and accessing polling places."¹

DRC has participated in the County's monthly Voting Accessibility Advisory Committee (VAAC) meetings since the VAAC's formation in August 2021. DRC also participated in the consultation meeting for the disability community under the California Voter's Choice Act (VCA), which was held on December 13, 2021, and has communicated with county elections staff outside of these formal meetings, sharing resources and assisting with the County's outreach efforts. We appreciate this new partnership with the

¹ 52 U.S.C. § 21061. ([Return to main document](#))

County and look forward to our ongoing collaboration to improve the accessible voting options for voters with disabilities.

We have been consistently impressed by the demonstrated commitment of county elections staff to inclusive processes, thoughtful engagement with the community, and clear communications. The high quality of the first draft of the County's EAP is further evidence of that commitment. It is an excellent document—particularly for a first draft—that is well organized, transparent, and full of useful information that will help the public understand their voting options under the VCA model, including options and services for voters with disabilities. Some features we especially like—and believe could serve as best practices for other counties that are drafting their own EAPs—are as follows:

- Your introductory letter on page 2
- The detailed table of contents on pages 3 and 4
- The logical presentation of basic information about the VCA model (under “Section 1”) before the voter education and outreach plan (under “Section 2”)
- The “Overview” section on page 6
- The clear and simple descriptions of the formulas used to determine the number of vote centers (a.k.a. Voter Assistance Centers [VACs]) and ballot drop boxes on pages 10 and 14
- The incorporation of accessibility information throughout the entire EAP, which is in addition to dedicated sections on accessibility, such as the “VAC Accessibility” section on page 11
- The maps of historical and potential locations of vote centers and ballot drop boxes² at Appendix H
- The inclusion of a glossary to assist readers with specialized elections-related terminology and common acronyms

² There appear to be typos in the paragraph before the “BDB Retrieval Teams” section on page 15 of the draft EAP, where there are references to Voter Assistance Centers rather than to ballot drop boxes. ([Return to main document](#))

Terminology for Vote Centers

We recommend that the County shift from calling its voting locations "Voter Assistance Centers" to using the VCA's terminology of "vote centers." Such a shift would not only match the language of the statute but also be consistent with the language used by other counties throughout the state that have been implementing or are beginning to implement the VCA. We also note that removing the "VAC" acronym from use may be helpful given its similarity to the acronyms VCA and VAAC, which will continue to be used to refer to the governing statute and to an ongoing committee.

Remote Accessible Vote-by-Mail (RAVBM)

We appreciate the scope of information provided about RAVBM on page 8 of the draft EAP, from how to access and use the RAVBM system to the system's technological aspects. Please consider the following recommendations for strengthening this section of the EAP even more.

Regarding the statement that RAVBM is "ideal for voters with disabilities," we suggest modifying this language slightly to avoid giving the impression that RAVBM is ideal for all. One of the main purposes behind AB 2252 (Ting 2016) was to allow voters with disabilities who prefer or need to vote from home to read and mark their ballot as privately and independently as possible. In order to use RAVBM, the voter must have the necessary equipment to do so, including an Internet-connected device, such as a home computer, and have private and independent access to a printer. Similarly, we suggest adding to the third paragraph of this section that the voter reads and marks the RAVBM ballot on the voter's own device, such as a computer or smartphone, with the ability to use the voter's own assistive technology. We believe it is useful to include more information about the technology required and the mechanical logistics when describing the RAVBM system. To be sure, RAVBM is a wonderful tool for many voters with disabilities, and providing this additional information will help voters to assess whether it is a tool that will work for them.

The first paragraph of this section states that there is a link to the RAVBM system on the county elections website. We applaud the County's providing

a link directly on its website. However, when we reviewed the website on January 18, 2022, we were unable to find the link. Is it a link that will be made available only a certain amount of time before each election? If so, we suggest adding a statement to that effect to the EAP.

The same sentence states that the RAVBM link is "available as a direct link to the hosted site." We suggest clarifying this phrase for the benefit of people who may not have the technological expertise to understand what it means.

If it is not already doing so, we recommend that the County explore making an RAVBM demonstration website available so that voters can become familiar with the technology prior to using it to cast their vote. Sacramento County also uses Democracy Live software for its RAVBM system; its demonstration website is described on and linked from its "[Accessible Vote by Mail](#)" webpage (look for the heading "Practice on our Demo Site").

We recommend adding to this section of the EAP that county-issued ballot return envelopes will have two holes, which allow voters with visual impairments to use a signature guide to sign in the proper place (or otherwise have a tactile way to locate the signature line on the envelope).³

Finally, please note that it was *Assembly Bill 37*, not *Senate Bill 37*, that was passed in 2021 to make RAVBM available to all registered California voters starting in 2022.

³ Cal. Sec'y of State, Conditional Approval of Democracy Live, Inc. Secure Select 1.0 Remote Accessible Vote by Mail System, at p. 2, ¶ 1 (Oct. 11, 2017), <https://votingsystems.cdn.sos.ca.gov/vendors/demlive/demlive-cert.pdf>. (Return to main document)

Voting Accessibility Advisory Committee (VAAC)⁴

We recommend that the discussion of the VAAC on page 23 of the draft EAP be revised to include information about how members of the public can join the committee. In addition, once a VAAC webpage is added to the county elections website, it would be helpful for the EAP to point prospective VAAC members and those who are interested in VAAC activities to that webpage.⁵

Mobile Vote Center

We are glad to know the County is planning for a mobile vote center. We recommend adding a sentence or two to the "Mobile VAC" section on pages 13 to 14 of the draft EAP that explains the benefits of a mobile vote center and what needs it would meet.

Voter Education Workshops

We recommend adding to the EAP that voter education workshops for each of the target communities (the disability community and certain communities in which the primary language is not English) will be held prior to each major election.⁶ The workshops are discussed on pages 24 and 25 of the draft EAP.

⁴ When describing the VAAC, the word "Voter" inadvertently is substituted for the word "Voting" a couple of times in the draft EAP. See pages 6 and 7. ([Return to main document](#))

⁵ We recommend the addition of similar information about the Language Accessibility Advisory Committee (LAAC)—encouraging public participation and pointing to a LAAC webpage—to this same section of the EAP. ([Return to main document](#))

⁶ California Elections Code § 4005(a)(10)(I)(i)(VI). ([Return to main document](#))

Direct Mailers to Voters

Page 25 of the draft EAP describes the two direct mailers that will be sent to voters. It mentions that the mailers may provide explanations of voting options, among other things. We request that the County include RAVBM information on both direct mailers to help publicize this specific voting option. We saw that helpful RAVBM information was included on postcards for the November 2020 and September 2021 elections, as illustrated by Figures 5 and 7 in Appendix G to the draft EAP, at pages 67 and 69, and we hope similar information will be included on future direct mailers.

Signature Options for Voters with Disabilities

The draft EAP includes examples of the official ballot stub and "Important Message for Vote by Mail Voters" from the November 2020 and September 2021 elections at pages 66 and 68, which are part of Appendix G. The "Important Message" reminds voters, among other things, that they must sign their ballot return envelope so that their vote can be counted. We request that the instructions about signing the ballot return envelope also describe how voters with disabilities can sign with a witnessed mark or signature stamp. Please see DRC's [publication](#) for voters with disabilities who are not able to sign their ballot return envelope, which is available from our voting publications webpage at <https://www.disabilityrightsca.org/resources/voting>.

EAP Glossary

Because of how helpful the glossary is, we recommend mentioning its existence in the body of the EAP, perhaps toward the end of the "Overview" section on page 6. Otherwise, there is a chance that voters will not notice it is there, either until they reach the end of the appendices (if they read that far) or perhaps at all, unless they read the table of contents closely. It would be unfortunate for such a valuable component of the EAP to be overlooked.

County Elections Website

We understand from VAAC meeting discussions that the county elections website is in the process of being improved in multiple ways. The new [Voter's Choice Act webpage](#) is very helpful and easy to use. We appreciate that it includes links to an [outline of the EAP adoption process](#); clear instructions for how to [submit comments](#) on the draft EAP, including an online form; and a page of [answers to frequently asked questions](#). We also appreciate how prominent the notices about the EAP process are on the [home page](#) for the county elections office. We recommend adding to the outline of the EAP adoption process the 14-day public comment period on any amended draft EAP.⁷

As mentioned in previous conversations with county elections staff and as alluded to in footnote 5 above, we continue to recommend that the County create webpages for the VAAC and the LAAC, where the public can read about the work of these committees, view the meeting schedules and past meeting minutes, and learn how to get involved.

Finally, we recommend that a webpage describing accessible voting options and services for voters with disabilities be added. The draft EAP already contains good descriptions of such options and services, so hopefully it would not require much additional effort to copy those descriptions onto a webpage. Ideally, such a webpage would have a prominent link from the home page for the county elections website, on par with the links and icons for "Voter Registration" and "Candidate Services." Alternatively, given the current structure of the website, we would suggest putting such a webpage under the existing category of "[Election Services](#)." Your office may find the free resources available from the Center for Tech and Civic Life at [ElectionTools.org](#), including the [election website template](#), useful.

⁷ California Elections Code § 4005(a)(10)(D)(ii). [\(Return to main document\)](#)

DRC's Comments on Yolo County's Draft EAP
January 20, 2022
Page 8 of 8

Thank you for the opportunity to provide these comments on the draft EAP.
Please feel free to contact us if you have any questions.

Sincerely,



STATEMENT BY [REDACTED] IN SUPPORT OF THE YOLO COUNTY DRAFT VOTER'S CHOICE ACT
ELECTION ADMINISTRATION PLAN

TO THE YOLO COUNTY ELECTIONS (YCE) OFFICE,

My name is [REDACTED] and I submit this statement in support of the Yolo County Draft California Voter's Choice Act Election Administration Plan. I am a member of the Board of Directors of Yolo Healthy Aging Alliance (YHAA). The mission of the YHAA is to enhance the well-being of older adults in Yolo County through education, collaboration and advocacy. I am also a member of the Yolo County Elections Language Accessibility Advisory Committee (LAAC).

The problem of low registration and voter turnout rates is not limited Yolo County. No greater threat is posed to our institution of democracy than when the majority of persons eligible to vote are not registered to vote, or if registered are not casting a ballot. Indeed, the State of California in enacting the Voter's Choice Act (VCA) has recognized the need to increase the number of California residents eligible to vote as a vital part of promoting support for a strong and vibrant democracy throughout California. I am very proud to be a resident of Yolo County which through its **Draft VCA Election Administration Plan** (hereinafter referred to as the **EAP Draft 1**) is taking the very important step of joining the growing number of counties converting to the VCA model. The VCA model provides that every voter receives a vote-by-mail ballot, the development of Vote Centers and the designation of Ballot Drop Box (BDB) locations. This approach to modernizing the voting process is an effective and superior approach to replacing the traditional and much more limited option of having only polling locations.

Preliminarily, I was pleased to see that the Board of Supervisors yesterday approved the funding for the Mobile Vote Center as called for on page 13 of the **EAP Draft 1**. The Mobile Vote Center must be a necessary and integral component of the County's VCA Election Administration Plan. The problem of low registration and low voter turnout rates requires an effective multi-faceted approach that continues the critical effort to not only encourage but actually achieve substantial increases in both voter registration and voter turnout rates. The more options there are to eligible Yolo County residents to register and to vote, the stronger our democracy will be. The existence of a mobile voter center qualitatively adds to the arsenal of tools available to the Elections Office to ensure that members of our most vulnerable sectors are provided with a real and practical means of participating in our elections. Working collaboratively with community organizations also allows the Elections office staff and volunteers through the Mobile Vote Center to get to a broad array of community events and effectively and efficiently provide registration and voting information to community members attending such events.

Comments on Section 1: Election Administration Plan

General Comments: The YCE and its entire staff is to be commended for development of the EAP Draft 1. It is a comprehensive and effective roadmap of how the county intends to comply with the requirements of the VCA as it transitions from the limited and rather dated system of polling place voting. The plan provides the specific citations to the VCA and other legal provisions set forth in the California Elections Code applicable to the discussion under each heading, which makes it convenient for the reader to consult the legal authority if desired.

Specific Comments: Minor edits are suggested as follows:

1. Page 7: Under the **Vote-by-Mail Ballots** heading, one of the telephone numbers for requesting a replacement ballot is missing a digit.
2. Page 8: Under the **Returning Voted VBM Ballots** heading, I suggest adding a brief explanation as to why Ballot Drop Box locations are subject to change, or at least a cross-reference to the more complete explanation given later under the heading **Voter Assistance Center and Ballot Drop Box Locations**, as well as on page 14 under the heading **BDB Location Recruitment Process**.

Overall, **EAP Draft 1** is thorough and comprehensive, and does an effective job of cross-referencing legal authorities and information in other sources, including the Appendices.

Comments on Section 2: Voter Education and Outreach Plan

We know that the problem of low registration and low voter turnout disproportionately impacts some of the most vulnerable communities in our County, including the elderly, the disabled, language minorities, the poor and those residents living in remote areas of the county.

Section 2 of the **EAP Draft 1**, together with the extensive number of Appendices, effectively and transparently captures not only the status of current efforts, but also outlines the YCE's commitment to improving voter registration and participation among all eligible voters, recognizing that addressing disparities in the democratic process is key to conducting accessible, fair, and transparent elections. Again, the YCE staff and leadership is to be commended for setting the foundation over the past several years of an approach and process that affirms strong and trusting relationships with a broad array of diverse community members and organizations. Implementation of Section 1 will require the ongoing and expanding commitment of community support for developing partnerships with the YCE to achieve effective education and outreach with all eligible voters. Section 2 sets out the roadmap to achieve that goal.

In conclusion, if the goal is to ensure that all eligible Yolo County residents are provided the necessary information to effectively exercise their most important right of all, the right to vote, then the Yolo County Draft VCA Election Administration Plan is a significant and critical major step forward that will effectively contribute to a vibrant and healthy democracy by increasing both voter registration and voter turnout through voter education and outreach.

Thank you for this opportunity to provide this statement. I look forward to continuing working with YCE through the Advisory Committees.



January 26, 2022

Jesse Salinas, Registrar of Voters
Yolo County Elections Office
Yolo County Administration Building
625 Court Street, Suite B05
Woodland, CA 95695

Dear Mr. Salinas:

Thank you to you and your staff for the effort and thought that have gone into the detailed draft Election Administration Plan, charting Yolo County's path to a permanent transition to a Voters Choice Act model of administering elections. Yolo Elections' dedication to making voting as accessible as possible to all voters is laudable, and the draft Election Administration Plan exemplifies that dedication.

This letter is in addition to, and largely mirrors, comments I've made about the draft EAP during Voter Accessibility Advisory Committee meetings, the public consultation meeting (December 13, 2021), and the public hearing (January 26, 2022).

I will also attach a copy of a letter I submitted to the Yolo County Board of Supervisors on January 25, 2022, expressing my support for Elections' request to use realigned state money to purchase a mobile vote center.

Consistent terminology: vote center – Please update the document to make the names of the future in-person voting locations consistent. Previously, these had been voter assistance centers, but Yolo County has decided to move away from that label, and this Election Administration Plan should reflect the new name. I believe the new term is "vote center." This would be modified easily to "mobile vote center," which would make more sense than "mobile voter center." ("Mobile voter center" wouldn't make as much sense since the center, not the voter, is what's mobile.) If the Voters Choice Act has standard language, Yolo County could adopt that. Updating this throughout the document would include tables, such as on p. 32 of Appendix B.

Some vote centers will be open for 11 days and some will be open for four days. Having more specific, and very clear, names for these would help decrease confusion. For example, since Winters is the one city that won't have one of the vote centers open for the more extended period, I can see people getting the impression Winters thinking that Winters won't get a vote center. I support [REDACTED]'s suggestion that the

vote centers be referred to as “11-day vote centers” “four-day vote centers.” Please use this label in text of the plan, as well as on pertinent tables and maps.

Avoid acronyms – Use of acronyms make documents less accessible. Please avoid acronyms whenever possible. Another reason to avoid acronyms is that so many of them have the letters V, A, and C that it’s particularly easy to get confused. Acronyms of note include VAC (voter assistance center), VC (vote center), BDB (ballot drop box), VBM (vote by mail), RAVBM (remote accessible vote-by-mail), VCA (Voters Choice Act), VAAC (Voter Accessibility Advisory Committee) LAAC (Language Accessibility Advisory Committee), EAP (Election Administration Plan).

Languages – I appreciate Elections’ attention to language accessibility. On page 16, it may be helpful do more than just list the name of the languages in which ballots will be available in that language. Having a sentence in each language saying that a ballot will be available in that language may be more useful.

Schematics of vote centers – I appreciate Elections staff including schematics of the vote centers. This shows attention to detail that goes far beyond checking the box of finding a place. Also, including schematics helps people with many types of disabilities plan ahead for their visit to a vote center.

Air circulation, ventilation, purification – The ongoing COVID-19 pandemic underscores the importance of having effective ventilation. Having good and space-appropriate ventilation for vote centers and the mobile vote center will keep election workers and voters safer, and would be good to address or consider.

Readability – I appreciate Elections’ strong outreach efforts, and that some examples of outreach materials are included in the draft plan. As I’ve mentioned previously, many of the outreach materials present substantial readability hurdles for people with a range of vision disabilities. Focusing on Appendix E, the example on p. 57 has a busy background behind the text; the red and blue dashes on p. 64 are too busy; and the red, blue, and white fields for the text on page p. 67 makes this document unreadable for some people. Improving readability will substantially increase the effectiveness of the outreach efforts. Elections staff may want to check if the printed and online materials work for page-readers or screen-readers some people with low vision or blindness use, and consider how materials work for people who have colorblindness.

Community partners and election working groups – Elections has a strong track record of doing outreach and working with partners. The draft Election Administration Plan

could document this a little more, which would show the efforts thus far and daylight partners and some of the discussions and processes.

In Appendix E, p. 56, I applaud listing partners involved in siting vote centers and ballot drop boxes, and having an additional chart for UC Davis organizations that have been partners. If there are other, non-UC Davis community organizations that have been consistent partners for outreach, engagement, doing voter registration drives, recruiting election workers, etc., it could be useful to include a table listing those, if there are enough it seems warranted and if they meet whatever benchmark for inclusion Elections may have. The example with which I'm most familiar is the nonpartisan civic engagement group Democracy Winters. Elections staff has had a presence at Winters' Festival de la Comunidad/Carnitas Festival; that event and Winters Hispanic Advisory Committee (now also Winters Community Corazón) may be additional options. Including information about community partners would be a way to document the ongoing and widespread community engagement and outreach that Elections staff members do. Having a table for UC Davis-affiliated organizations but not one for non-university organizations doesn't reflect Elections' dedication to countywide outreach.

Before the November 2020 election, Elections staff worked closely with election working groups across Yolo County. Based on the Winters Election Working Group, these groups helped select the locations of the voter assistance centers (as they were then called) and the ballot drop boxes. Since it looks like many of those ideas are carried forward into the Election Administration Plan, mentioning the role played by those earlier election working groups would document the process and also document the community-involved nature of the selections.

Voter Accessibility Advisory Committee and Language Accessibility Advisory Committee – I agree with comments to expand the information about these advisory groups, including information about how to join.

Media partners – The Media Partners table on p. 60 of Appendix F shows CalMatters as affiliated with UC Berkeley. To the best of my knowledge, CalMatters is not affiliated with UC Berkeley. According to their [mission](#), "CalMatters is a nonpartisan, nonprofit journalism venture committed to explaining how California's state Capitol works and why it matters." It is based in Sacramento. I suggest either removing "(UC Berkeley)," or double-checking the name of the news outlet to which this table intends to refer.

Mobile vote center – I am very excited about the mobile vote center. Based on the BizBox website, their trailers have stairs. Verify that accessibility of the mobile vote centers, and how voters with disabilities can be accommodated, is addressed.

Thank you to you and your staff for your work on this, and for making voting as accessible as possible to Yolo County voters. I appreciate Elections' ongoing efforts and seemingly boundless enthusiasm for voter engagement.

Sincerely,



February 14, 2022

Mr. Jesse Salinas
Registrar of Voters
Yolo County Administration Building
625 Court Street, Suite B05
Woodland, CA 95695

Sent via electronic transmission (elections@yolocounty.org)

Re: Feedback on Yolo County's Amended Draft Election Administration Plan

Dear Mr. Salinas,

I am writing on behalf of Asian Americans Advancing Justice - Asian Law Caucus (Advancing Justice - ALC) to provide feedback on the Yolo County amended draft Election Administration Plan (EAP) published on January 31st, 2022, with a particular emphasis on the language access components. Advancing Justice - ALC was founded in San Francisco in 1972 as the nation's first legal and civil rights organization serving low-income, immigrant, and underserved Asian American and Pacific Islander communities. We bring together legal services, community empowerment, and policy advocacy to fight for immigrant justice, economic security, and a stronger democracy in California.

Over the last five years, our voting rights team has provided technical assistance to community based organizations and election offices in several counties that transitioned to the Voter's Choice Act (VCA). Additionally, we operate a poll monitoring program across 13 counties in the Bay Area and Central Valley, which has given us insight into a variety of practices and approaches to language access in election administration in both VCA and non-VCA counties. We are impressed by the level of thoughtfulness your team has put into drafting the EAP, particularly with respect to making elections inclusive and equally accessible to all voters. We also identified several opportunities for you to strengthen your plans with regards to serving voters with language needs.

Bilingual Poll Worker Recruitment

We recommend providing additional detail about recruiting and staffing bilingual poll workers at Vote Centers. The language in your EAP states, "Vote Center poll workers who can speak Chinese, Korean, Punjabi, Russian and/or Spanish may also be available at our voting locations." Please continue to prioritize the provision of in-person language assistance as much as possible. Although County Clerk/Registrar of Voters (CC/ROV) Memorandum #21221 reduced the number of required languages, the need for language assistance is still significant. To that end, it would be helpful to know more specific detail about how your office plans to recruit bilingual poll workers and reach out to minority language communities, especially since this has been a challenge for Yolo County and other counties in past elections.

Bilingual Education Workshops

We are pleased that your EAP includes plans for bilingual voter education workshops with language minority communities. Once again, despite the changes in language-related legal requirements, please continue to organize these workshops and conduct robust outreach to Chinese, Korean, Punjabi, Russian, and Spanish-speaking communities in Yolo County. In addition, we urge your office to design these language workshops with care. In ALC's experience collaborating with other VCA counties in past election cycles, language workshops often struggle to reach a meaningful portion of the limited-English speaking community. Simply holding a meeting dedicated to the VCA, at a time/place/location of the elections office's choosing, will not generate significant turnout or engagement. An alternative approach is needed, and the alternative approach needed may be different for each language community. As a starting point, we recommend working closely with community-based organizations and groups to host language workshops in the community. We also suggest working with community organizations to incorporate VCA education into existing programming or events held at locations community members know well. Provide remote access options, such as live video streaming and a call-in option. We commend your office for coordinating with trusted community-based organizations in the past, and we hope you will apply this same approach to the implementation of language workshops in the future.

Facsimile Ballots

We greatly appreciate that you will continue to provide facsimile ballots. We recommend providing additional detail about how facsimile ballots will be made available at Vote Centers. The language in your EAP states "All Vote Centers will have facsimile ballots available for reference in all ballot types for the following languages: Chinese, Korean, Punjabi, Russian and Spanish." It would be helpful to know more specific detail (such as in the Facility Layouts in Appendix C) about how and where these facsimile ballots will be posted for public display.

One approach other VCA counties have found effective is to provide a language table at every vote center where all language resources can be found, including copies of all translated and facsimile ballots for the county. This has the advantage of creating a central location for voters to easily locate as well as being straightforward and consistent for vote center staff to set up. Facsimile ballots should be clearly displayed and labeled in multiple languages. For example, if you use binders, include a sample on the outside and a label with the name of the language in English and the language itself.

To ensure that vote center workers understand what language assistance is available and set up vote centers correctly, we encourage your office to provide thorough training and checklists for vote center workers. Actively introduce facsimile ballots during vote center worker training and give vote center workers the chance to familiarize themselves with a facsimile ballot during training so that they understand exactly what it is, what it looks like, and how it is useful. Incorporate language access materials such as translated signage and facsimile ballots into any Election Day setup checklists or procedures that vote center workers are required to follow.

Placement of Vote Centers and Ballot Drop Boxes

Overall, the placement of Vote Centers and ballot drop boxes seems to be well thought out. Davis, Woodland, and West Sacramento—home to the county’s largest minority and limited English proficient (LEP) communities—appear to be well served by the proposed distribution of voting facilities. However, one concern is that more rural parts of northern and western Yolo County, including towns like Dunnigan, Guinda, and Rumsey, would be situated quite far from any voting infrastructure. Although these towns are relatively small in population, they are still home to several thousand residents who would need to travel over 20 miles to reach an official ballot drop box or receive in-person voting assistance at a Vote Center. It is worth noting that, according to your maps in Appendix H, these areas also have some of the lowest rates of voter registration and vote-by-mail turnout in the county. They are also home to higher concentrations of Spanish-speaking residents and people with disabilities. A more visible presence in these areas could help increase electoral participation. If resources permit, installing additional ballot drop boxes or conducting special voter outreach in rural portions of Yolo County could be fruitful. We are particularly interested to learn more specific details about your Mobile Vote Center and plans for its deployment in upcoming elections.

We recognize the hard work that goes into preparing a document as detailed and complex as this draft EAP, and we applaud your commitment to receiving robust public input by translating the amended draft EAP into more than the minimum required number of languages. Please do not hesitate to reach out if you have questions about any of these recommendations or if our team can be a resource to your office.

Sincerely,

February 14, 2022

Jesse Salinas, Registrar of Voters
Yolo County Elections Office
Yolo County Administration Building
625 Court Street, Suite B05
Woodland, CA 95695

Dear Mr. Salinas:

Thank you to you and your staff for the effort and thought that have gone into the detailed draft, and now the amended draft, Election Administration Plan, including incorporation of comments received on the draft plan.

Avoid acronyms

As I mentioned in my comment on the draft Election Administration Plan, acronyms make documents less accessible. Please avoid acronyms whenever possible. Another reason to avoid acronyms is that so many of them have the letters V, A, and C that it's particularly easy to get confused. Acronyms of note include VAC (voter assistance center), VC (vote center), BDB (ballot drop box), VBM (vote by mail), RAVBM (remote accessible vote-by-mail), VCA (Voter's Choice Act), VAAC (Voting Accessibility Advisory Committee), LAAC (Language Accessibility Advisory Committee), and EAP (Election Administration Plan).

The amended draft Election Administration Plan still relies heavily on acronyms, including in headings. For example, subheadings in Appendix B include "VC and BDB Locations" and "The VC and BDB Hours of Operation," and the body of the text on p. 33 uses those acronyms. It is particularly important that these key phrases are spelled out throughout the document.

Appendix B: Proposed Vote Centers and Ballot Drop Boxes

The address for the Winters vote center is incorrect. The amended draft plan lists it as:
Public Safety Facility – EOC Training Room
702 W. Main St., Winters

Per the Winters Police Department's [website](#), the correct address is:
Public Safety Facility – EOC Training Room
702 Main St., Winters

I realize that 702 W. Main St., Winters, was given as the address for the Voter Assistance Center during the 2021 Gubernatorial Recall Election; however, Main Street turns into West Main Street about five blocks north of the Public Safety Facility, so 702 W. Main St. is a different location and people who rely on their phone's GPS will not end up at the vote center.

Appendix D: Advisory Committees

Thank you for adding more information about the Voting Accessibility Advisory Committee and the Language Accessibility Advisory Committee. Please consider adding how people can get more information or attend meetings. This could be as simple as adding that people interested in getting more information or in attending committee meetings can contact the Elections Office or visit a relevant part of the Elections website.

I looked on the Elections website to see I could find a link to the agendas, etc., and didn't find anything since the August 13, 2021, [press release](#) about the committees getting established and holding their first meetings. The Voter's Choice Act [section](#) of the website may be a good place to have information about the advisory committees, including a list of meeting times and dates, and links to agendas for each meeting. Having this online would increase transparency and also potentially increase membership.

Appendix E: Community Partners and Events

Thank you for expanding this section to better reflect Elections' tremendous outreach efforts and the many community partners to which Elections staff reached out by adding "Table 20 Community Organizations." However, I don't understand the organizational structure of the "Community Organizations – Outreach Contacts" table. It appears that most of these listings are organizations, but some appear to be names of contacts within organizations. Having two columns, one of which is subdivided into two columns, is particularly confusing since the righthand column doesn't have a label.

I suggest updating this table by only including organizations' names, not contacts within the organizations; by editing the header from "Community Organizations – Outreach Contacts" to omit mention of "contacts" (if "contacts" refers to contact individuals within some organizations); by extending the black row with the "Community Organizations" text across the entire table; by making the vertical lines within the table of equal weight; and by listing organizations alphabetically.

A short explanatory paragraph about how this collection of community partners were of assistance would help. This could be very general, but would help readers understand how Elections connects with the community.

"City of Winter (Working Groups & City Council)" should be "City of Winters (Working Groups & City Council)."

"Winters Democracy Works" should be corrected to "Democracy Winters."

"Resources for Independent Living" is missing a "t." There are a few other typos in the table that would be good to clean up.

In "Yolo County IHSS*," please spell out "In-Home Supportive Services." If this refers to the County program, this listing is correct. If it is meant to refer to the Yolo County In-Home Supportive Services Advisory Committee, please specify that.

It is unclear why some listings include an asterisk and some do not. Please either include a note below the table explaining the significance of the asterisks or omit them.

Appendix F: Media Partners

Thank you for correcting the CalMatters listing. It would be helpful to have a short explanatory paragraph before this table. Are these media organizations Elections contacted, or that have contacted Elections, or some mix of the two, or something else?

Thank you to you and your staff for your work on this, and for making voting as accessible as possible to Yolo County voters. I appreciate Elections' ongoing efforts and sustained enthusiasm for voter engagement.

Sincerely,



California's protection & advocacy system

LEGAL ADVOCACY UNIT

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Fax: (916) 504-5801
TTY: (800) 719-5798
Intake Line: (800) 776-5746
www.disabilityrightsca.org

February 14, 2022

Submitted via email (elections@yolocounty.org)

Jesse Salinas
Assessor, Clerk-Recorder, and Registrar of Voters
County of Yolo
625 Court Street, Room B-05
Woodland, CA 95695

Re: Comments on Yolo County's Amended Draft EAP

Dear Mr. Salinas:

Disability Rights California (DRC) appreciates the opportunity to comment on Yolo County's amended draft Election Administration Plan (EAP), which was posted online for public comment on January 31, 2022. DRC is the protection and advocacy system for Californians with disabilities. Under the Help America Vote Act of 2002, DRC is charged with ensuring "the full participation in the electoral process for individuals with disabilities, including registering to vote, casting a vote and accessing polling places."¹

DRC also submitted written comments on the first draft of the EAP and participated in the public hearing on that first draft on January 26, 2022. In addition, DRC has been an active member of the County's Voting Accessibility Advisory Committee (VAAC).

¹ 52 U.S.C. § 21061. ([Return to main document](#))

Having reviewed the amended draft EAP, we continue to be impressed by the demonstrated commitment of county elections staff to inclusive processes, thoughtful engagement with the community, and clear communications. We remarked previously on the high quality of the first draft of the EAP, and we now observe that the amended draft EAP is a further improvement as the County refines its plans for implementation of the California Voter's Choice Act. We appreciate the diligent work of county elections staff, including your office's responsiveness to public comments during the EAP drafting process and at VAAC meetings.

Comparing our written comments on the first draft of the EAP to the amended draft EAP, we note that two small typos remain, where, in describing the VAAC, the word "Voter" inadvertently is substituted for the word "Voting" a couple of times. (See pages 5 and 6 of the amended draft EAP.) Moreover, based on the discussion about the first draft of the EAP at the VAAC meeting on January 20, 2022, we recommend adding to the EAP a statement that the County has been looking into making a demonstration website available for its Remote Accessible Vote-by-Mail (RAVBM) system to enable voters to try the RAVBM system before they are actually voting in an election. As described in DRC's written comments on the first draft of the EAP and as we discussed at the last VAAC meeting, an RAVBM demonstration website, like the one used by Sacramento County, would help voters become familiar with the technology prior to using it to cast their vote. Including this information in the EAP would educate voters about this additional tool the County is exploring and alert them to look for it online when the next election nears.

As stated previously, we appreciate this new partnership with the County. We look forward to our continued collaboration to improve the availability

DRC's Comments on Yolo County's Amended Draft EAP
February 14, 2022
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and public awareness of accessible voting options for voters with disabilities.

Sincerely,