



October 4, 2011

Mr. Drew Bohan
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

Dear Mr. Bohan:

County of Orange Request to Amend the Parameters and Guidelines of the Modified Primary Election Mandate

The Department of Finance has reviewed the draft staff analysis of the proposed Parameters and Guidelines presented by the County of Orange (claimant) asking the Commission to determine whether specified costs incurred for activities associated are reimbursable state mandated costs (Claim No. CSM 01-TC-13 "Modified Primary Election").

As a result of our review, it is unclear how the one-time reimbursable activities 4a and 4b, related to the vote-by-mail program, are reasonably necessary for the performance of the activities found reimbursable in the statement of decision. It does not appear that the modifications to the vote-by-mail notice and application are necessary to allow decline-to-state voters to vote a party ballot. Voters are already currently made aware of their right to do so through information on the voter registration card. We recommend that the Commission further review how these activities are reasonably necessary to comply with the mandate.

Pursuant to section 1181.2, subdivision (c)(1)(E) of the California Code of Regulations, "documents e-filed with the Commission need not be otherwise served on persons that have provided an e-mail address for the mailing list."

If you have any questions regarding this letter, please contact Jeff Carosone, Principal Program Budget Analyst at (916) 445-8913.

Sincerely,

NONA MARTINEZ
Assistant Program Budget Manager

Enclosure

Enclosure A

DECLARATION OF
DEPARTMENT OF FINANCE
CLAIM NO. CSM 01-TC-13

1. I am currently employed by the State of California, Department of Finance (Finance), am familiar with the duties of Finance, and am authorized to make this declaration on behalf of Finance.

I certify under penalty of perjury that the facts set forth in the foregoing are true and correct of my own knowledge except as to the matters therein stated as information or belief and, as to those matters, I believe them to be true.

10-3-11
at Sacramento, CA

Jeff Carosone
Jeff Carosone