

August 27, 2024

The Honorable Lola Smallwood-Cuevas  
Member, California State Senate  
1021 O Street, Suite 6730  
Sacramento, Ca 95814

**RE: Senate Bill 830 (Smallwood-Cuevas) – OPPOSE  
As Amended August 15, 2024**

On behalf of the Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), California State Association of Counties (CSAC), and the League of California Cities (Cal Cities), we write in concerned opposition to your Senate Bill 830 as amended on August 15, 2024. As local governments and local agencies that rely on complex supply chains in order to operate and maintain our facilities, as well as to implement state goals like providing shelter for the unhoused and other vulnerable communities, we are concerned that the augmented costs to sheet metal materials from this bill will make the construction and maintenance of local facilities more costly and difficult to achieve.

Our concerns over this legislation are several, but they largely source from a fundamental dynamic affecting local governments and agencies today: carrying out public goals like sheltering and housing, while meeting ongoing expectations to operate our facilities cost-effectively and efficiently, during a time of escalating costs of materials and construction. Local governments and agencies today are subject to a growing list of legislative and regulatory mandates that require significant investment in hard infrastructure and the materials that comprise it. These expectations including providing shelter to the unhoused, as well as safe facilities with necessary ventilation to respond to pandemic outbreaks, similarly safe and publicly-accessible facilities during heat and cold events from extreme climatic conditions, as well as the everyday operation of municipal facilities that provision the electricity, safe drinking water, and other services on which our citizens rely.

Despite the growing list of policy and regulatory rules with which we must comply, our budgets have only stagnated or shrunk in recent years, not dissimilar to our current state budget. Furthermore, the household budgets of our ratepayers are more stretched than ever. As a general matter, local governments and agencies are loathe to pass costs to our ratepayers unless truly necessary, and we are governed by strict constitutional standards if we do. Yet, our costs for new construction, retrofits, and maintenance of existing facilities only grow year on year, while financial support from state and federal partners do not meet the moment, leaving us in the unenviable position of having to uphold major policies beyond our basic duties without sufficient resources to achieve those policy goals.


Additionally, we fear this bill not only puts strain on our public responsibility to operate facilities financially prudently, it will likely lead to a rush of future laws that apply California labor and wage standards to all parts of the supply chain, regardless of where those supplies are sourced. We fear that costs for all sorts of facility and operational materials will skyrocket to levels far beyond what our procurement staff have currently budgeted.

We leave it to partners in our coalition to detail why California wages may not be appropriate or necessary for manufacturers and suppliers in other regions, states, and polities. We, instead, implore the Legislature to remember that adding complicated rules to the supply chain that support public services only accelerates the costs that must ultimately be borne by the public. While we understand the need for fair wages, we think this legislation far oversteps a balanced approach by incorrectly assuming prevailing wages at project sites are also the appropriate wage for workers in facilities hundreds or thousands of miles away, where labor markets differ greatly.


In short, many of our local operations are already approaching breaking points, especially budgetary cliffs. And we fear failure to provide services, because costs are burdensome, will only become a future political issue with which we (and ultimately the state legislature) must deal. We therefore ask that this legislation not be advanced at this time, and that we instead take a closer look at the existing drivers of costs that make confronting the housing shortage, heat events, sheltering, and pandemics already challenging to accomplish.

For these reasons, we must regretfully oppose your SB 830. If you have any questions or would like to discuss further, please contact Sidd Nag (RCRC) at [snag@rcrcnet.org](mailto:snag@rcrcnet.org); Anthony Tannehill (CSDA) at [anthonyt@csda.net](mailto:anthonyt@csda.net); Mark Neuberger (CSAC) at [mneuberger@counties.org](mailto:mneuberger@counties.org); or Damon Conklin (Cal Cities) at [dconklin@calcities.org](mailto:dconklin@calcities.org).

Sincerely,

  
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