



LEGAL ADVOCACY UNIT

1330 Broadway, Ste. 500
Oakland, CA 94612
Tel: (510) 267-1200
TTY: (800) 719-5798
Intake Line: (800) 776-5746
Fax: (510) 267-1201
www.disabilityrightsca.org

September 10, 2019

VIA E-MAIL

Bill O'Neill
2850 Fairlane Court
Placerville, CA 95667
elections@edcgov.us; bill.oneill@edcgov.us

Re: Comment on El Dorado County's Draft EAP

Dear Mr. O'Neill,

Disability Rights California (DRC) appreciates the opportunity to comment on El Dorado County's draft Election Administration Plan (EAP). 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

Website

The Voter's Choice Act (VCA) requires: "A description of the accessible information that will be publicly available on the accessible Internet Web site of the county election official." Elec. Code §4005(a)(10)(I)(i)(IV). DRC is aware that the County intends to update the Elections website.

The County needs to provide a description of the available information and provide explanations such as how voters can acquire the Voter Information

¹ See 42 U.S.C. §15461. ([Return to Main Document](#))

Guide in an accessible format. El Dorado County should also improve the general information available for voters with disabilities on the Elections website. Ideally, the Elections website will have a page describing the accessibility options for voters with disabilities, such as explaining that all vote centers will be accessible and have three accessible voting systems. The page should also provide an overview of other accessibility requirements like curbside voting and provide answers for frequently asked questions by voters with disabilities. This page could provide links to some of the planned videos discussed in the EAP if they are relevant to accessible voting. Videos are an effective way to teach voters about the accessible voting system and Remote Accessible Vote by Mail.

Additionally, the website should help facilitate the VCA's requirements for public input and numerous public meetings. The website needs to explain how the public can provide input on election planning. The website should provide information on upcoming events and post past meeting agendas.

Workshops

The VCA requires that information about workshops for the disability community and language minority communities be described in the Voter Education and Outreach Plan part of the EAP. Elec. Code §4005(a)(10)(I)(i)(vi)(ia)&(ib).

We suggest holding the workshops closer to the March primary election rather than the Fall of 2018. In our experience, the Fall months are too far from the election to garner much public interest. Ideally, the workshops would be held sometime close to the mailing of vote-by-mail ballots. The County should consult Voting Accessibility Advisory Committee members about their thoughts on the timing.

The County is only required to conduct one workshop each for the disability and language communities. However, the County should consider planning more than one workshop so that voters do not need to travel long distances. For example, it might not be convenient for a voter to travel to Placerville from the South Lake Tahoe area to attend a workshop

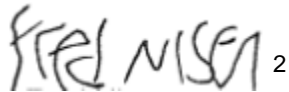
Mobile Vote Centers

The VCA requires counties to consider the need for a mobile vote center. Elec. Code § 4005(a)(10)(B)(VI)(xiv). The EAP should provide an analysis of whether mobile vote centers are needed in El Dorado County. Mobile

vote centers might be necessary to provide meaningful access to in-person voting for some El Dorado County voters. Although mobile vote centers should be accessible for voters with disabilities, they are not required to be open for four to ten days or be on a mobile platform like a trailer. Nevada County successfully set up a one-day voter center in a community building in an isolated small town in 2018. The County might also consider a mobile vote center in areas where there are often voters with disabilities such as senior centers.

Thank you for your dedication to this project and your willingness to be responsive to community and outside input. We appreciate the open line of communication we maintain with you and your staff. You can reach us with questions or comments at any time.

Sincerely,

A handwritten signature in black ink that reads "Fred Nisen" followed by a superscripted "2".

Fred Nisen
Supervising Attorney for Voting Rights
Voting Rights Practice Group

A handwritten signature in black ink that reads "Paul R. Spencer" followed by a superscripted "3".

Paul R. Spencer
Staff Attorney for Voting Rights
Voting Rights Practice Group

² Fred Nisen signature ([Return to Main Document](#))

³ Paul R. Spencer signature ([Return to Main Document](#))