



July 20, 2020

The Honorable Reginald B. Jones-Sawyer, Jr.  
Member of the Assembly  
State Capitol, Room 2117  
Sacramento CA 95814

**RE: AB 1007 (Jones-Sawyer) – Local government financing: juvenile justice  
As amended 6/29/2020 – OPPOSE  
Set for hearing 7/28/2020 – Senate Public Safety Committee**

Dear Assembly Member Jones-Sawyer:

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), we write to jointly express our opposition to AB 1007, your measure that would redirect Juvenile Justice Crime Prevention Act (JJCPA) funds, revise the composition of local Juvenile Justice Coordinating Councils, and recast various elements of required multiagency juvenile justice plans. While our organizations support the continued evaluation of the best and most effective ways to address the therapeutic needs of youth in our community, we are steadfast in our opposition to diverting meaningful and long-standing investments in local systems at a time when interrelated reforms are being considered.

We understand that AB 1007 is in response to findings of a recent state audit (report 2019-116) that examined five counties' use and reporting of JJCPA funds. As was outlined briefly in the audit report, the JJCPA program was enacted statutorily in 2000 and funded for just over a decade through the state General Fund. JJCPA – along with a variety of other local assistance services and programs – was moved under the 2011 Public Safety Realignment fiscal structure where it now is guaranteed a minimum level of Vehicle License Fee (VLF) funding and enjoys constitutional protections approved in Proposition 30 (2012). This latter development requires careful thinking and understanding about the constitutional implications of effectively repurposing JJCPA funds as is contemplated in AB 1007.

In addition to concerns about constitutional impediments, our organizations' opposition primarily relates to the breadth of and timeframe available to fully consider the implications of the programmatic and structural changes outlined in AB 1007. As a result of the pandemic and truncated schedule, the Legislature has a very limited window to hear, consider amendments to, and adequately assess the policy impacts of hundreds of bills in the five weeks that remain in this unprecedented legislative year. At the same time, the recently enacted state budget assumes the closure of the Division of Juvenile Justice and, prospectively, counties' assumption of responsibility for the entire juvenile justice population statewide. Before the end of session, the budget trailer bill

to carry out this very consequential policy change will be made public and considered. Time and attention are needed to ensure those provisions offer needed flexibility and funding to achieve the intended improvements in rehabilitative programming and supports. Very complex and delicate system and jurisdictional changes that fundamentally alter the juvenile system in California already are being considered. It does not seem appropriate or wise to – with very little time available to consider potential ramifications and interactions – simultaneously reform one of the state’s underlying juvenile justice funding structures in haste.

AB 1007 proposes to redirect nearly every dollar of JJCPA funds, which today are – in many instances – dedicated to staffing and personnel costs that make up the backbone of our juvenile probation departments. These expenditures are wholly eligible and lawful under JJCPA. While counties are not opposed to evaluating ways in which to improve JJCPA reporting and the structure of local coordinating councils (as was done through Chapter 880, Statutes of 2016), we are not in a position to upend a stable, constitutionally protected funding structure when we are being asked to assume vast new responsibilities with little opportunity to assess resulting system impacts.

We share the goals of improving outcomes and providing responsive services that offer sustainable and positive change for the youth in our communities. For those reasons, we do not believe there is either the time or opportunity to determine how the scope of changes offered in AB 1007 should be structured, particularly given other major reform efforts underway. CSAC, UCC, and RCRC must therefore respectfully but firmly oppose this measure. Please feel free to contact Josh Gauger at CSAC ([jgauger@counties.org](mailto:jgauger@counties.org)), Elizabeth Espinosa at UCC ([ehe@hbeadvocacy.com](mailto:ehe@hbeadvocacy.com)), or Paul Smith at RCRC ([psmith@rcrcnet.org](mailto:psmith@rcrcnet.org)) for any questions on our associations’ perspectives. Thank you.

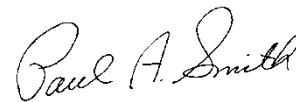
Sincerely,



Josh Gauger  
CSAC Legislative Representative



Elizabeth Espinosa  
UCC Legislative Representative



Paul A. Smith  
RCRC Senior Vice President,  
Governmental Affairs

cc: The Honorable Nancy Skinner, Chair, Senate Public Safety Committee  
Members and Counsel, Senate Public Safety Committee  
Daniel Seeman, Office of Governor Gavin Newsom  
Jessica Devencenzi, Office of Governor Gavin Newsom