

## Unusual Nature of the November 2025 Special Election VCA Task Force Draft

The November 4, 2025, statewide special election on Proposition 50 was unusual in several important respects. It was not simply another election conducted under the VCA. Rather, it was a statewide special election called on a compressed timetable, conducted under temporary statutory modifications, and held in an unusually high-profile political environment. Those overlapping features matter because the VCA was designed around a model of planning, outreach, access, and predictability. The November 2025 election asked counties to operate within that model while also adapting quickly to a one-measure statewide special election that drew far more attention - and ultimately far more participation - than is typically associated with special elections. As described below, these conditions were in significant tension with one another.

The compressed timeline created two distinct and compounding implementation challenges. [SB 280 \(Cervantes and Pellerin\)](#), enacted on August 21, 2025, called the election and established temporary rules. From SB 280's enactment to Election Day, counties had fewer than 75 days' notice that they would be administering a statewide special election. More importantly from an implementation standpoint, counties had only 46 days between enactment and the ballot-mailing deadline. That left a substantially shorter window than usual to make and communicate decisions about vote center placement and operations, ballot drop-off infrastructure, translations, accessibility, outreach, poll-worker recruitment and training, and public education.

Contemporaneous reporting captured just how compressed that window felt on the ground. The Sacramento Bee described county officials as heading to "battle stations" and preparing a "speed run" toward November 4, while CalMatters reported that administrators were scrambling to line up ballot printers, vote centers, and workers. The Secretary of State's office reportedly warned that with less than two and a half months, counties would have difficulty hiring people, training them, and getting everything running properly, and officials anticipated that ordinary statutory deadlines would have to be suspended. County registrars described the same problem in practical terms: Humboldt County's registrar said his office would usually have at least five months of lead time for a statewide election and that even that is a "Herculean effort," while Orange County's registrar said he began ordering paper, envelopes, and toner before the election was formally approved because he concluded he could not wait and still be confident he could pull the election off.<sup>1</sup>

For counties using the VCA model, that work included not only complex operational decisions, but also decisions about vote center placement, ballot drop-off infrastructure, language access, disability access, and public communications. In a regular statewide

**Commented [RJ1]:** Statewide Special Elections  
2025 - 50.16%  
2021 Recall - 58.45%  
2009 Special - 28.40%  
2005 Special - 50.14%  
2003 Recall - 61.20%  
- Bob Page

**Commented [JR2]:** While I agree with this statement, the VCA also is designed for adaptability and to better allow counties to respond to unknown conditions. For example, VCA was a key element in the successful administration of the 2020 election during the COVID pandemic. - Dean Logan

**Commented [JR3]:** I am not clear on the use or reference to "significant tension" here. - Dean Logan

**Commented [RJ4]:** Could also mention the UOCAVA deadline on E-45; not just the E-29 VBM mailing deadline - Bob Page

**Commented [JR5]:** All true, but not unique to the VCA. Absent the VCA the same or similar (even more significant) compression and constraint would have existed under the traditional polling place model. - Dean Logan

<sup>1</sup> Kate Wolfe, [CA elections officials head to battle stations, anticipating redistricting vote](#), Sacramento Bee (updated Aug. 6, 2025); Maya C. Miller, [Gavin Newsom wants an election in a hurry on his gerrymander. Here's what has to happen](#), CalMatters (Aug. 19, 2025).

## Unusual Nature of the November 2025 Special Election VCA Task Force Draft

election, those activities are spread across a much longer planning horizon. Here, they were compressed into a much shorter period.

The election was also unusual because SB 280 temporarily gave VCA counties a menu of options that differed from the standard VCA structure. Under ordinary VCA rules, as noted previously, counties must provide at least one vote center per 50,000 registered voters during the 10-day early-voting period and at least one vote center per 10,000 registered voters beginning four days before Election Day, along with ballot drop-off locations at a minimum ratio of one per 15,000 registered voters, or two, whichever is greater.

For the November 2025 special election, however, SB 280 allowed counties to use lower vote center ratios - one per 60,000 voters during the earlier period and one per 30,000 voters from E-3 through Election Day - or, in limited cases, to proceed under existing special-election provisions.<sup>2</sup> According to the Secretary of State's election-method statistics, 26 of the 29 VCA counties in this election chose the reduced SB 280 ratios, while Madera and Nevada counties retained standard VCA ratios and Amador County used existing special-election authority.<sup>3</sup> The significance of that choice meant that most VCA counties, including the state's largest population centers, approached this election with fewer required in-person voting locations than would have been required under the standard VCA framework.

That departure from the ordinary VCA model is important because the VCA's vote center ratios were not arbitrary. They were part of a statutory design intended to expand flexibility without abandoning access. The Act replaced neighborhood polling places with a countywide model in which every voter receives a ballot by mail, can return it in multiple ways, and can obtain in-person services over multiple days at accessible vote centers located with attention to transportation, language needs, disability access, and historically underrepresented communities. In other words, the VCA is not simply a vote-by-mail system with fewer physical locations; it is an access model that depends on planning, outreach, and an adequate in-person network. Reducing the number of required vote centers in a statewide special election therefore raised a serious policy question: whether the reduced minimums would still preserve the level of access the VCA was meant to provide - especially if voter interest or in-person demand proved higher than expected.

Before the election, advocacy organizations raised concerns that the temporary modifications authorized by SB 280 could have disproportionate effects on voters who rely more heavily on in-person and community-based election services. In comments

**Commented [RJ6]:** The VCA statute addresses both regular elections and special elections. The requirements under EC 4005(b) were one of the options available to counties.

What is being referred to as "standard" are the requirements for regular elections.

SB 280 did not allow lower vote center ratios. It actually provided a different E-minus date by which the number of vote centers were required to increase (E-3).

If SB 280 had been silent on the requirements for vote centers, the minimum requirement under EC 4005(b) would have solely applied, which is:

E-10 to E-1 = 1 vote center for at least 60,000 voters

E-0 - 1 vote center for at least 30,000 voters - Bob Page

**Commented [JR7]:** Those are not the codified ratios for Special Elections. - Dean Logan

**Commented [JR8]:** They were not arbitrary, but also not based on any data. They were a function of legislative negotiation. - Dean Logan

**Commented [JR9]:** Oddly, based on statute, the Nov 2025 Special Election and enabling legislation was an expansion of Vote Centers under the Special Election provisions, not a reduction. - Dean Logan

**Commented [RJ10]:** Wasn't this question considered when VCA was first adopted since EC 4005 includes a subdivision (b) for special elections?

This would be better framed as an opportunity to evaluate whether the existing special election provisions in VCA are still appropriate. - Bob Page

<sup>2</sup> SB 280, sec. 3(c); see also Cal. Elec. Code § 4005(b).

<sup>3</sup> California Secretary of State, [November 4, 2025, Statewide Special Election Election Method and Location Statistics by County - Estimates as of 10/7/25](#).

## Unusual Nature of the November 2025 Special Election VCA Task Force Draft

submitted during consideration of the bill and in correspondence with the Secretary of State and the Governor's office, advocates argued that reduced vote center minimums, compressed implementation timelines, and uncertainty about the scope of available outreach funding warranted caution in a statewide special election. They emphasized that voters with disabilities, limited-English-proficient voters, younger voters, voters experiencing homelessness, and Black and Latino voters may depend more heavily on accessible in-person voting options, language assistance, and targeted outreach. Those concerns are relevant to evaluating whether temporary departures from the ordinary VCA framework preserved the level of access the VCA is designed to provide, particularly for voters who depend most on the VCA's access innovations and protections.

Language access also warrants separate attention. SB 280 temporarily altered the usual translation process by removing the ordinary requirement that the Secretary of State consult with advisory bodies and nonpartisan organizations with expertise in language needs and by shortening the public examination period for translated materials, reducing the usual opportunities for expert input and public review. Advocacy groups took the position that the Proposition 50 ballot title and summary and ballot label should be translated in all languages covered by Elections Code section 14201, in addition to applicable federal requirements, while the Secretary of State later concluded that SB 280 did not expand the office's translation obligations beyond the languages otherwise required under Elections Code section 9054. Without resolving that dispute, the episode still highlights an operational concern: in a compressed statewide special election, ambiguity about the scope of translation obligations and reduced opportunities for expert review may diminish the accessibility and transparency of the election process for voters who rely on in-language materials.

A parallel concern applies to disability access: while SB 280 did not waive the relevant consultation requirements, the compressed timetable made it substantially more difficult to replicate the VCA's ordinary consultative process for voters with disabilities, thus limiting the opportunity for community feedback.

Voter education and outreach funding presents a related concern. California has historically provided limited and inconsistent funding for voter education and outreach, with allocations varying significantly between elections -- and disparities in access to reliable, plain-language election information have consistently been greater during off-cycle elections. That baseline problem was compounded here by the unexpected nature of the special election, the compressed timeline, and the complexity of the ballot question itself. SB 280 allocated funding for the 'actual and reasonably necessary' costs of the election and required any savings to be rolled over to future elections. Whether that allocation reached county-level outreach efforts in meaningful amounts, and whether it supported in-language and community-based voter education targeted

**Commented [JR11]:** Same comment as above - Oddly, based on statute, the Nov 2025 Special Election and enabling legislation was an expansion of Vote Centers under the Special Election provisions, not a reduction. - Dean Logan

**Commented [JR12]:** Again, the departures for Nov 2025 were an expansion over the statutory provisions for Special Elections, not a reduction. - Dean Logan

**Commented [RJ13]:** SB 280 was a temporary decision to encourage more access than was required in EC 4005(b), not less. - Bob Page

**Commented [JR14]:** This condition/effect is not unique or specific to VCA. - Dean Logan

**Commented [RJ15]:** To which subdivision of EC 4005 does this refer? - Bob Page

**Commented [RJ16]:** 2022 was the last time state funding was available to VCA counties specifically for VEOP. And, even then it was not enough to even cover the cost of the minimum required two direct voter contacts. - Bob Page

## Unusual Nature of the November 2025 Special Election VCA Task Force Draft

toward underrepresented communities, is an important question for the task force to examine in evaluating the November 2025 experience.

Those access concerns did not arise in a low-turnout vacuum. Nor did turnout resemble a typical special election: registered-voter turnout reached 50.16 percent of California's registered voters. About 42% of eligible Californians voted, exceeding a 2005 initiative special (35%) and 2009 initiative special (21%), nearly matching the 2022 midterm (41%) and 2003 gubernatorial recall (43%), and trailing only the 2021 recall (52%) among those comparisons.<sup>4</sup> Counties were administering a high-salience statewide contest under compressed timelines and modified rules.

Election observers' accounts and the public record from Election Day document congestion at numerous vote centers. Multiple reports described long lines and extended wait times at vote centers in major counties operating under the reduced SB 280 ratios, including Los Angeles and Sacramento. CalMatters referenced Secretary of State Shirley Weber saying "there was "huge turnout" in person Tuesday night, with long lines wrapping around buildings at many polling sites."<sup>5</sup> The November 2025 special election combined compressed planning time, reduced required in-person capacity in most VCA counties, and unexpectedly high turnout, and those conditions coincided with long lines at some vote centers. Additional county-level data, including actual deployment decisions, staffing levels, wait-time logs, and information about when and where in-person demand was concentrated would help us to understand more about how capacity constraints impacted the voting experience in California and how we might better anticipate and address the issue in the future.

The November 2025 special election is best understood not as a routine VCA election, but as an election conducted under unusual and temporary conditions that complicate any straightforward assessment of the VCA model itself. Counties were required to administer a prominent statewide contest on an accelerated timetable, under modified vote center requirements and altered language-access procedures, while questions remained about how to preserve outreach, accessibility, and public confidence. The election produced substantial participation, but turnout alone does not fully answer whether all voters were served equally well. For that reason, the November 2025 experience should inform concrete standards for future VCA special elections -- including exploring minimum notice periods before ballot-mailing deadlines, preserved

<sup>4</sup> Public Policy Institute of California. [Key takeaways from the Proposition 50 election](#) (Nov. 12, 2025)

<sup>5</sup> Connor Sheets, Andrea Flores & Clara Harter, [Long lines at polling centers as time runs out to vote on Prop. 50, Los Angeles Times](#) (Nov. 4, 2025); [Recap: Prop 50 passes, NBC News projects, with long lines reported at vote centers](#), NBC Los Angeles (Nov. 4, 2025); Maya C. Miller, [Gavin Newsom's Proposition 50 just passed. Here's what happens next](#), CalMatters (Nov. 5, 2025); ABC7. [Long Line Seen at Corona Vote Center as Projection Announced](#) (Nov. 4, 2025); MSNBC, [California Prop 50 voters commit to long lines at the polls to be heard on redistricting](#), (Nov. 4, 2025), video; NBC Los Angeles (NBCLA). [Long Lines at Some Vote Centers. What Does It Say About Prop 50?](#) (Nov. 4, 2025), video.

**Commented [RJ17]:** After 5 p.m. - Bob Page

**Commented [JR18]:** I am not sure the data on this condition support to conclusion or assertion made here. The congestion noted late in the day on Election Day was consistent with what is experienced at particular Vote Centers in all statewide elections where a higher threshold of Vote Center placement and, in some elections, higher turnout occurs. This is a weighted condition at Vote Centers located on college and University campuses. There were many additional Vote Centers in relative proximity that did not experience congestion or wait times. Caution and context are important in making a causation correlation here. This may very well be a VCA condition that is unrelated to the Special Election. - Dean Logan

**Commented [RJ19]:** SB 280 waived the following existing statutory requirements:

- EC 9040

(a) Every constitutional amendment, bond measure, or other legislative measure submitted to the people by the Legislature shall appear on the ballot of the first statewide election occurring at least 131 days after the adoption of the proposal by the Legislature.

- EC 12000

For each statewide election, the Governor shall issue a proclamation calling the election. The proclamation shall be issued by the Governor under his or her hand and the Great Seal of the state no later than the 148th day prior to the election and shall state the time of the election and the offices, if any, to be filled. - Bob Page

**Unusual Nature of the November 2025 Special Election  
VCA Task Force Draft**

translation and disability-access consultation requirements, and vote center floor ratios calibrated to realistic turnout expectations in high-salience contests -- so that compressed timelines do not become a recurring occasion to dilute the access protections the VCA was designed to provide, particularly for voters who depend most on in-person access, language assistance, disability accommodations, and targeted voter education and outreach.

DRAFT