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## California Secretary of State Elections Division

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August 27, 2025

County Clerk/Registrar of Voters (CC/ROV) Memorandum # 25074

TO: All County Clerks/Registrars of Voters

FROM: /s/ Jana M. Lean  
Chief, Elections Division

RE: Statewide Special Election: Methods of Conducting the Election

This memorandum is intended to provide clarity as to how counties may conduct the November 4, 2025, Statewide Special Election. Senate Bill 280 (SB 280, Chapter 97 of the Statutes of 2025), which provides additional methods to conduct the election, may be found at:

[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202520260SB280](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB280)

County elections officials are encouraged to include information about how the county will be conducting the Statewide Special Election in their county voter information guides or in their vote-by-mail ballot packets.

### In-person Voting Locations

County elections officials are encouraged to provide as many in-person voting locations as possible. However, at a minimum, for the November 4, 2025, Statewide Special Election, county elections officials are authorized to provide in-person voting locations as follows:

**Method #1: Voter's Choice Act (VCA) Counties - SB 280.** VCA counties may choose to conduct the statewide special election pursuant to SB 280 SEC. 3(c):

October 25 (E-10) through October 31, 2025 (E-4) – at least one vote center is provided for every 60,000 registered voters within the county, as determined by the latest report of registration issued by the Secretary of State. For a jurisdiction with fewer than 60,000 registered voters, a minimum of one vote center shall be provided.

- Vote centers must be open for a minimum of eight hours per day.

November 1 (E-3) through November 4, 2025 (E) – at least one vote center is provided for every 30,000 registered voters, as determined by the latest report of registration issued by the Secretary of State. For a jurisdiction with fewer than 30,000 registered voters, a minimum of one vote center shall be provided.

- From E-3 through E-1, vote centers must be open for a minimum of eight hours per day.
- On Election Day, vote centers must be open from 7 a.m. to 8 p.m., inclusive.

**Method #2: VCA Counties – EC Section 4005(a).** VCA counties may choose to conduct the statewide special election pursuant to Elections Code section 4005(a)(3) and (4).

October 25 (E-10) through October 31, 2025 (E-4) – at least one vote center is provided for every 50,000 registered voters within the jurisdiction where the election is held, as determined on E-88. For a jurisdiction with fewer than 50,000 registered voters, a minimum of two vote centers shall be provided.

- Vote centers must be open for a minimum of eight hours per day.

November 1, 2025 (E-3) through November 4, 2025 (E) – at least one vote center is provided for every 10,000 registered voters within the jurisdiction where the election is held, as determined on E-88.

- From E-3 through E-1, vote centers must be open for a minimum of eight hours per day.
- On Election Day, vote centers must be open from 7 a.m. to 8 p.m., inclusive.

**Method #3: VCA Counties – EC Section 4005(b).** A county that has previously conducted an election under Elections Code section 4005(a) or has adopted a final plan of administration of elections, may choose to conduct the statewide special election pursuant to Elections Code section 4005(b).

October 25 (E-10) through November 3, 2025 (E-1) – at least one vote center is provided for every 60,000 registered voters. For a jurisdiction with fewer than 30,000 registered voters, the county elections official must make a reasonable effort to establish a vote center.

- Vote centers must be open for a minimum of eight hours per day.

November 4, 2025 (E) – at least one vote center is provided for every 30,000 registered voters. For a jurisdiction with fewer than 30,000 registered voters, the county elections official must make a reasonable effort to establish a vote center.

- On Election Day, vote centers must be open from 7 a.m. to 8 p.m., inclusive.

**Method #4: Traditional Polling Place Counties - Consolidated Precinct Boards - SB 280.** A traditional polling place county may choose to conduct the statewide special election pursuant to SB 280 SEC. 3(d), as an alternative to procedures that would otherwise be applicable in that county:

While maintaining separate geographical precincts under the existing limits on number of voters provided in Elections Code section 12223, the elections official may establish consolidated precinct boards, located within the same physical polling place, serving the voters residing in multiple adjacent precincts established pursuant to Section 12223 at a maximum ratio of one consolidated precinct board location for every 10,000 registered voters, as determined by the latest report of registration issued by the Secretary of State.

- From November 1 (E-3) through November 3, 2025 (E-1), consolidated polling locations shall be open for a minimum of eight hours per day.
- On Election Day, consolidated polling locations shall be open from 7 a.m. to 8 p.m., inclusive.

For the purposes of the above:

- Consolidated polling places shall be established pursuant to (SB 280 SEC. 3(d)(2), (4), and (5))
- County elections officials shall provide each consolidated polling place with enough ballots, provisional ballots, and provisional ballot envelopes to ensure every voter can be accommodated, as necessary. (SB 280 SEC. 3(d)(2)(E))

County elections officials must provide at least one location, open at least during regular business hours, no later than October 7, 2025 (E-28) for a voter to:

- Return, or vote and return, the voter's vote by mail ballot.
- Register to vote, update the voter's voter registration, and vote pursuant to Elections Code section 2170.
- Receive and vote a provisional ballot pursuant to Elections Code section 3016 or Article 5 (commencing with Section 14310) of Chapter 3 of Division 14 of the Elections Code.
- Receive a replacement ballot after submitting a valid replacement ballot request as provided for in Elections Code section 3014.

- Vote a regular, provisional, or replacement ballot using accessible voting equipment that provides for a private and independent voting experience.  
(SB 280 SEC. 3(d)(3))

**Method #5: Traditional Polling Place Counties.** A traditional polling place county may choose to conduct the statewide special election accordance with procedures that would otherwise be applicable in that county, including Elections Code section 12241.

- On Election Day, polling locations shall be open from 7 a.m. to 8 p.m., inclusive.

**Method #6: All Mail Ballot Counties.** Counties continue to conduct the statewide special election as an all-mail ballot election.

### **Ballot Drop-off Locations**

County elections officials are encouraged to provide as many ballot drop-off locations as possible. However, at a minimum, for the November 4, 2025, Statewide Special Election, county elections officials are to provide ballot drop-off locations as provided in SB 280 SEC. 3(b):

- A traditional polling place county shall provide at least two vote by mail ballot drop-off locations within the county or at least one vote by mail ballot drop-off location for every 30,000 registered voters within the county, as determined by the last report of registration issued by the Secretary of State, whichever results in more vote by mail ballot drop-off locations. For a county with fewer than 30,000 registered voters, at least one vote by mail ballot drop-off location shall be provided.
- A VCA county shall provide at least two ballot drop-off locations within the county or at least one ballot drop-off location provided for every 15,000 registered voters within the county, as determined by the last report of registration issued by the Secretary of State, whichever results in more ballot drop-off locations.
- For all counties, a ballot drop-off location consists of a secure, accessible, and locked ballot box located as near as possible to established public transportation routes and that is able to receive voted ballots.
- All ballot drop-off locations shall be open at least during regular business hours beginning not later than October 7 (E-28), through November 4, 2025 (E).

- At least one ballot drop-off location shall be an accessible, secured, exterior drop box that is available for a minimum of 12 hours per day including regular business hours.

#### **Consolidated Precinct Waiver Process for Method #4: Traditional Polling Place Counties - Consolidated Precinct Boards - SB 280**

As required by SB 280 SEC. 3(e), the Secretary of State will establish a process to consider requests from counties to adjust or partially waive the minimally required number, location, or operational duration of consolidated polling places for counties who utilize consolidated precinct boards under SEC. 3(d), or to partially waive the provisions regarding the maximum number of voters in a precinct as required by Elections Code section 12223.

The process shall include, but not be limited to, review and modification, denial, or granting of a county's request in a timeframe to be determined by the Secretary of State.

The Secretary of State shall not grant a county a complete waiver of the minimally required number, location, or operational duration of consolidated polling places described in SEC. 3(d), and shall not grant a county a waiver of the provisions regarding the maximum number of voters in a precinct as required by Elections Code section 12223 that would result in more than 3,000 voters being assigned to any single precinct.

The Secretary of State shall not grant a partial waiver or modification to a county unless the elections official in that county demonstrates all of the following:

- The official made best efforts to secure the required in-person voting locations.
- The plan will not have a negative disparate impact on disabled voters or any protected class of voters.
  - "Protected class" means a class of voters who are members of a race, color, or language minority group, as referenced and defined in the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).
- The plan will not reduce in-person voting locations below a number of locations necessary to safely and efficiently accommodate the anticipated demand for in-person voting services.

The Secretary of State will issue additional CCROVs to provide further guidance, including information on the details and procedures of the waiver process.

If you have any questions, please feel free to contact Rachelle Delucchi or Robbie Anderson at [rdelucch@sos.ca.gov](mailto:rdelucch@sos.ca.gov) or [aanderso@sos.ca.gov](mailto:aanderso@sos.ca.gov). Voter's Choice Act counties may wish to contact LaKenya Jordan at [ljordan@sos.ca.gov](mailto:ljordan@sos.ca.gov).