CEAC Surveyor Policy Committee
132nd CSAC Annual Meeting
Gaylord Pacific Resort and Convention Center
1000 H Street, Chula Vista, CA 91910
Sycamore Room, Level 4
Thursday, December 3, 2026 | 10:00 a.m. - 11:30 a.m.

AGENDA

Chair, Robert Pachinger, Calaveras County
Vice Chair, Bob Bronkall, Humboldt County
Vice Chair, Paul Mabry, Alameda County

CEAC Surveyor Policy Committee fosters a unified community of county surveyors dedicated to excellence in public service through collaboration, knowledge-sharing, and mutual support. We strive to enhance the accuracy, integrity, and efficiency of land surveying practices by working together to address challenges, promote innovation, and uphold public trust.

10:00 a.m. I. **Welcome and Self Introductions**
Robert Pachinger, Calaveras County, Chair

10:10 a.m. II. **Action Items**

- (Vice-Chair Mabry) present CEAC Policy and Legislative Priorities – ***Attachment One*** **(40 minutes)**
  - Legislative Proposal regarding Accessibility Formatting of PDF images
  - Establish a CEAC policy supporting active participation by County engineers, county surveyors, and other appropriate county representatives in the California Geographic Information Association (CGIA), the California Geographic Information Coordinating Council (CGICC), the California Chapter of the Geospatial Professional Network (CalGPN), and other relevant statewide geospatial professional organizations
  - Establish robust funding and grant opportunities to preserve historical road files, survey records, subdivision maps, right-of-way documents
  - Certificates of Correction Cross-Reference to Original Recorded Maps
  - Amend Government Code § 27584 to include disaster-related replacements of monuments

10:50 a.m. III. **Discussion Items (30 minutes)**

- Report from working group on AI software Apps
- CEAC Forum – Noteworthy Posts
- Outreach efforts to unite the County Surveyors
  - Update roster

11:20 a.m. IV. Discussion Items (Chair Pachinger) Roundtable and Future Meeting Topics **(10 minutes)**

- Suggestions for future topics

11:30 a.m. V. **Adjourn (Chair Pachinger)**

CEAC Surveyor Policy Committee Meeting Minutes
21st Annual CEAC Policy Conference Capitol Event Center
1020 11th Street, 3rd Floor, Sacramento
August 20, 2026 | 10:45 a.m. - 12:00 p.m.

AGENDA

Chair, Robert Pachinger, Calaveras County
Vice Chair, Bob Bronkall, Humboldt County
Vice Chair, Paul Mabry, Alameda County

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10:45 a.m. I. **Welcome and Self Introductions**
Robert Pachinger, Calaveras County, Chair

Remote attendees were unable to access the beginning of the meeting due to technical difficulties. After the issues were resolved, access was restored briefly before being lost again. The meeting continued for those who were present, with the expectation that the minutes and related information would provide all participants with a complete account of the proceedings. Note that a copy of the power point presentation is attached.

10:55 a.m. II. **Discussion Items**

- (Vice Chair Mabry) Review CEAC Policy and Legislative Priorities, Attached **(10 minutes)**
  - Review existing priorities (Attachment A) to:
    - confirm that existing policies are still relevant
    - recommend that irrelevant priorities be modified or eliminated
  - Consider new or modified priorities as follows:
    - Support legislation that would allow use of no more than 25% of the Survey Monument Preservation Fund for examining records of survey and corner records so that the cost of service is covered.
    - Support legislation that would allow use of no more than ___% of the Survey Monument Preservation Fund in support of development and maintenance of systems for ADA compliance of record map information.

Vice Chair Mabry presented the previous CEAC Policy and Legislative Priorities. A brief discussion was held regarding whether to keep the existing policies and priorities or revise them. To move this item forward, Vice Chair Mabry made a motion to form an ad hoc committee consisting of 4 members to recommend policies and priorities for adoption at the CSAC/CEAC Annual Meeting in December. Howard Dashiell, Director of Transportation, Mendocino County seconded the motion, and it

passed unanimously. Vice Chair Mabry will reach out to fellow members to confirm participation in the committee.

- (Dallas Sweeney, BPELSG) Monument Rehab Responsibilities(**15 minutes**)
  - When a monument used in a survey is missing a tag or existing tag is damaged
  - When monument used in a survey is in an area prone to wildfires and has a plastic tag (less than permanent and durable)

Dallas distributed a copy of the Spring 2025 bulletin from the Board for Professional Engineers, Land Surveyors, and Geologists which discussed the issue. It is attached to these minutes. He explained the County Surveyors do not have the authority to require compliance with §8771.6 of the PLS Act. However, they may ask questions about the survey. He noted that it is difficult to mandate specific types of monumentation, and that plastic and aluminum caps have been destroyed during fires.

Vice Chair Bronkall mentioned that surveyors should set their own monuments if they find disturbed monuments that they must reference. They should add their tag to any relied-upon monument that is missing one. Dallas explained that monuments that are rehabilitated should be tagged and recognizable as a monument. Not every object found in the field needs to be tagged.

- (Dallas Sweeney, BPELSG) License Renewal Questionnaire(**5 Minutes**)
  - What is the expectation from those with multiple licenses

Dallas explained that those with dual licenses will need to take an assessment for each license. He is soliciting feedback from all who have undergone this process.

- (Chair Pachinger) Use of AI software apps. Goal: Pool resources to solve issues(**20 Minutes**)
  - Working Group to Address State and Federal ADA requirements regarding pdfs required to be accessible.
  - Extend tools to all members

Chair Pachinger started the discussion by outlining the deadlines for meeting ADA requirements. Per the Federal Register Vol 91, No. 75, (April 20, 2026), 28 CFR Part 35, State and local government entities with populations of 50,000 must comply by April 26, 2027. Public entities fewer than 50,000 must comply by April 26, 2028.

David Grim, Development Services Manager, County of San Luis Obispo, explained that the county has contacted a vendor to develop a tool to support compliance. Our hope is to pool resources so a tool can be made available to all counties at no cost. Vice Chair Bronkall described a generalized approach applicable to all maps. If

further information is needed, the client is directed to visit the office of the County Surveyor.

During the discussion, it was clarified that legacy information is not currently affected. However, it is expected that this information will need to eventually comply. Counsel will need to be involved to determine what constitutes a reasonable effort. Some jurisdictions do not have the maps posted online and are apparently in compliance.

To move this forward, Brian Gillooly, County Surveyor, County of Sacramento made a motion to form an ad hoc committee to identify tools or plan for the tools that will help counties meet compliance requirements. David Grim seconded the motion, and it passed unanimously. Vice Chair Bronkall will lead this effort. As the deadline for larger jurisdictions is approaching within months, timely progress is essential.

- (Vice Chair Mabry) CEAC Forum – Noteworthy Posts Goal: Promote communication among County surveyors(**5 minutes**)

Vice Chair Mabry presented various noteworthy posts and encouraged participation in the CEAC Forum.

- (Vice Chair Bronkall) CEAC Surveyor membership roster update and distribution – ***Attachment One*** (**5 Minutes**)

Vice Chair Bronkall provided statistics regarding CEAC Surveyor membership. See attached power point.

11:55 a.m. III. (Chair Pachinger) Roundtable and Future Meeting Topics (**5 Minutes**)

- Suggestions for future topics

It was encouraged to provide topics through the forum.

12:00 p.m. IV. **Adjourn**

Attachment A
CEAC Policy and Legislative Priorities
(2021-2022)

1. Surveyor Recorder Relationship Clean-up. Support coordinated effort with the County Recorders Association to update outdated language in the Government Code relating to transfer and sharing of documents, through Senate Committee on Governance and Finance Omnibus bill.

2. Surveyor Monument Preservation. Support legislation that would simplify the collection of the Monument Preservation Fund Fee.

Past Legislative and Administrative Policy Guidelines
(From 2021-2022 CEAC Legislative & Administrative Policy Guidelines)

1. Include funding for horizontal and vertical control surveying networks to support transportation infrastructure construction in future infrastructure funding legislation.

2. Support legislation that would allow use of no more than 25% of the Survey Monument Preservation Fund for examining records of survey and corner records so that the cost of service is covered.

3. Participate in the California Geographic Information Association and the California Geographic Information Coordinating Council.

4. Support funding for Counties' Geographic Information Systems (e.g. authorize local agencies to recover full costs of creating and maintaining automated records).

5. Support legislation which will allow use of a non-conditional lot line adjustment map to replace the lot line adjustment process.

County Engineers Association of California

LEGISLATIVE PROPOSAL ACTION REQUEST FORM

2027–2028 Legislative Session

Please return this form by 5pm, October 16, 2026

For your proposal to be considered, please respond to all questions included in this form. Proposals must be submitted to CEAC through your Public Works Director or Department Head. Please submit this form to Merrin Gerety at mgerety@counties.org

Proposals will be referred to the appropriate policy committees and considered during the 2026 CSAC Annual Meeting, November 30–December 4, 2026.

Contact Name: Robert W. Bronkall

County: Humboldt County

Position: County Surveyor

Phone: 707.445.7205

Email: bbronkall@co.humboldt.ca.us

Brief Description of Legislative Proposal:

Amend California Government Code §§ 7405, 11135, and 11546.7, and seek corresponding amendments to Federal 28 CFR § 35.201, to establish a narrow exception from accessibility formatting of PDF images for 1) faithful electronic copies of instruments recorded or maps and other documents filed with county recorders, and 2) for engineering and architectural drawings prepared principally for construction. The exception would not eliminate duties to provide effective communication, reasonable modifications, or accessible assistance when legally required.

I. BACKGROUND INFORMATION

A. Problem

(1) What problem does the proposal address? Please share specific facts and examples to illustrate the problem.

Official recorded or filed records must retain their authentic presentation, while construction drawings communicate information primarily through diagrams, alignments, profiles, dimensions, symbols, layouts and spatial relationships. Conventional PDF tagging, reading-order remediation and screen-reader formatting often cannot convey these features meaningfully without loss of technical context and substantial expense. Examples include filed survey maps and construction plan sheets with linework, profiles and graphic details. The attached policy statement identifies this burden but does not provide quantified costs or individual project examples.

(2) Does the proposal address a problem of statewide significance? Give specific facts and examples, which demonstrate a statewide need for the proposal.

Yes. The proposed classes of documents are created, filed, maintained, or posted by counties and public agencies throughout California, and construction plans are routinely provided by design professionals and applicants. The same accessibility formatting issue can therefore arise across counties, rather than in one jurisdiction. The supplied statement does not include a county survey, statewide cost estimate, or examples from named counties.

(3) Have counties been involved in any litigation regarding this problem? If so, cite the case.

To be determined.

(4) What other source materials, case law, or data, document the existence of the problem (e.g., periodicals, government agency reports, private studies, law review articles, newspaper articles)?

The attached CEAC Surveyor Policy Committee policy statement, "ADA accessibility for PDFs" (revised October 8, 2026), explains the functional limitations of screen readers for graphics-intensive maps and plans and the administrative cost concern. It identifies California Government Code §§ 7405, 11135, and 11546.7 and 28 CFR § 35.201, and discusses the separate federal effective-communication requirement under Federal 28 CFR § 35.160. No empirical study, published cost survey or case law citation is supplied.

B. Interested Parties

(1) What counties, organizations or individuals are interested in the problem?

The CEAC Surveyor Policy Committee is identified in the attached proposal. The issue also potentially concerns County Recorders, County Surveyors, County Architects, County Engineers, county public works departments, public agency plan reviewers, and engineering and architectural practitioners. Expressions of support by specific other counties or organizations have not been documented in the supplied materials.

(2) What counties, organizations or individuals would be sources of information about the problem?

County Recorders are the source of maps. County Surveyors are the source of corner records. County Engineers and County Architects are the sources of plans.

(3) Who would be likely to support/oppose the proposal? Why?

Potentially Support: Potential supporters include public agencies, County Recorder, County Engineers, County Architects, and County Surveyors and others concerned about substantial remediation expense and loss of technical meaning.

Potentially Oppose: Disability-rights and digital-accessibility advocates may be concerned that exceptions limit independent access to public information.

These are anticipated positions, not verified organizational endorsements or opposition.

(4) Identify groups or other governmental agencies that could be affected by the proposal, either favorably or adversely? Please Discuss.

Potentially Affect favorably: Potential supporters include public agencies, County Recorder, County Engineers, County Architects, and County Surveyors and others concerned about substantial remediation expense and loss of technical meaning.

Potentially Affect Negatively: Disability-rights and digital-accessibility advocates may be concerned that exceptions limit independent access to public information.

These are anticipated positions, not verified organizational endorsements or opposition.

II. PROPOSAL

A. Existing Law

(1) What are the statutory provisions currently applicable to the proposal?

California Government Code § 7405 incorporates federal Rehabilitation Act § 508 accessibility requirements for covered state electronic and information technology; § 11135 prohibits discrimination in state-conducted or state-funded programs, including disability discrimination; and § 11546.7 concerns accessibility certification for state-agency websites. Federal 28 CFR § 35.200 establishes the Title II web-content

accessibility rule, with exceptions in § 35.201. Separate Title II effective-communication obligations, including 28 CFR § 35.160, would remain in force. California changes alone cannot override federal law.

(2) What case law is relevant to this issue? Please summarize and cite.

To be determined

(3) Why is existing law inadequate to deal with the problem?

Existing specified exceptions do not expressly exempt, as continuing categories regardless of filing or posting date, faithful recorder-document reproductions and primarily graphic engineering or architectural construction plans. Consequently, agencies may face proactive tagging and reading-order remediation demands for materials whose practical technical content may not be meaningfully translated by these techniques. The policy seeks a narrow, clear exception while preserving case-specific accessibility obligations.

B. Suggested Legislation

(1) Describe the specific bill proposal.

Add a technical-formatting exception to Government Code § 7405 for faithful electronic reproductions of county recorder filings and recorded documents, and principally graphic engineering/architectural construction plans; add coordinating language to § 11135; and clarify the state-agency website certification provision in § 11546.7. Seek federal amendment of 28 CFR § 35.201 to add parallel categorical exceptions for recorded/filed public records and construction engineering/architectural plans, regardless of document date. Search interfaces, ordinary application forms, notices and general narrative content would remain subject to otherwise applicable rules. Retain Title II effective communication and reasonable modifications. Detailed redline language appears in the accompanying October 8, 2026 policy statement.

(2) Do similar provisions exist in other California laws?

The attached statement notes existing federal exceptions for archived content, certain preexisting electronic documents, third-party content, certain secured individualized documents, and preexisting social-media posts under 28 CFR § 35.201. It does not identify a California statute already providing the specific exemption proposed here.

(3) Describe a hypothetical application of the proposal

A county posts a scanned record of survey filed with the county recorder and a roadway construction plan showing geometric alignments, profiles, stationing, dimensions and symbols. Under the proposed rule, the county could retain faithful PDFs without proactively rebuilding those technical sheets into tagged, linearized versions. Its website search tools and ordinary public-facing documents would remain accessible, and it would respond to a person requesting effective communication or an appropriate accessible alternative.

C. Fiscal Impact

(1) Would there be any potential fiscal impact on counties under the proposal? If so, describe.

The proposal is intended to reduce county staff time, professional remediation expenses and administrative work associated with proactively converting technical and archival PDFs. Counties would still incur costs to provide effective communication and reasonable modifications when needed. The submitted policy statement contains no quantified savings or implementation cost estimates.

(2) Would there be any potential financial impact on other persons or organizations, public or private?

Design professionals and construction applicants could avoid expenses associated with proactive technical remediation of primarily graphic plan sets. Organizations that provide accessible-document remediation

services could experience reduced demand for this particular work. Persons needing accommodations would retain access-related rights; costs of individualized assistance may continue.

Financial impact is likely a cost savings to public agencies.

D. History

(1) Has this proposal ever been introduced in the Legislature? If so, what was the bill number and why did it fail?

Unknown.

(2) Is judicial or executive branch resolution of the problem possible? Explain.

Unknown.

E. Public Policy

(1) What are the public policy reasons in support of this proposal? Against?

In support: preserve integrity of legal records and technical meaning of construction drawings, avoid substantial expense for format changes that may not improve practical comprehension, and direct resources toward effective individualized access.

Against: categorical exemptions may reduce opportunities for independent, timely access by people with disabilities, and some technical materials may be partly amenable to accessible alternatives. The proposal addresses these concerns by defining the covered materials narrowly and preserving effective-communication duties.

(2) Would this proposal affect any related public policy? If so, describe.

Yes. It would interact with disability nondiscrimination, public access to records, government digital services, archival authenticity, construction permitting, and professional design-document practices. It would exclude only specified document-formatting requirements, not general website access, accessible public interfaces or substantive disability rights.

CEAC Surveyor Policy Committee
ADA accessibility for PDFs
Revised 10/15/2026

Executive Summary

Legislation modifying relevant provisions of California and Federal law to allow Maps and Plans to be exempted from the recent ADA Compliance Requirements.

Policy Statement

The State of California and the federal government should establish a narrowly defined exception from prescribed electronic-document accessibility formatting standards for electronic copies of scanned instruments recorded or maps and other documents filed in the Office of a County Recorder; and for engineering and architectural plans, drawings, and related sheets prepared principally for construction purposes. Official recorded or filed instruments must retain their authentic content and presentation, while construction plans primarily convey technical information through complex graphics, diagrams, layouts, alignments, dimensions, symbols, and spatial relationships that frequently cannot be meaningfully represented through conventional PDF tagging or screen-reader formatting without substantial expense or loss of context. Requiring universal remediation of these materials imposes a disproportionate administrative and financial burden on public agencies, design professionals, and applicants. Accordingly, California Government Code sections 7405, 11135, and 11546.7 and Title 28, Code of Federal Regulations, section 35.201 should be revised to exempt such copies and plans from proactive technical PDF accessibility conformance requirements regardless of when they were created, recorded, filed, or posted, while retaining a public entity's separate obligations to provide effective communication, reasonable modifications, and accessible information or assistance when required by law.

Discussion

Maps and plans convey technical information through complex graphics, diagrams, layouts, alignments, dimensions, symbols, and spatial relationships that frequently cannot be meaningfully represented through the use of a screen reader or be described using words. The use of these documents is typically limited to a small audience who are educated in understanding the highly technical information contained within these documents; versus documents that are intended for use by the public in general. It is not likely that such documents could be made fully accessible in way that would be useable for someone who requires an accessible document. Because of these reasons an exemption from making .PDF's of maps and plans accessible is necessary. Regulations for accessible .PDFs exist in both State and Federal law.

California Law — Proposed Revisions

California Government Code §§ 7405, 11135, and 11546.7. These provisions do not independently displace federal ADA Title II obligations.

A. Government Code § 7405

7405. The Legislature finds and declares that the ability to utilize electronic or information technology is often an essential function for successful employment in the current work world.
(a) In order to improve accessibility of existing technology, and therefore increase the successful employment of individuals with disabilities, particularly blind and visually impaired and deaf and hard-of-hearing persons, state governmental entities, in developing, procuring, maintaining, or using electronic or information technology, either indirectly or through the use of state funds by other entities, shall comply with the accessibility requirements of Section 508 of the federal Rehabilitation Act of 1973, as amended (29 U.S.C. Sec. 794d), and regulations implementing that act as set forth in Part 1194 of Title 36 of the Federal Code of Regulations.
(b) Any entity that contracts with a state or local entity subject to Section 11135 for the provision of electronic or information technology or for the provision of related services shall agree to respond to, and resolve any complaint regarding accessibility of, its products or services that is brought to the attention of the entity.
(c) For purposes of compliance with the technical electronic-document accessibility standards incorporated by this section, a state governmental entity is not required to make the following materials conform to prescribed document tagging, text extraction, reading-order, or comparable automated accessibility formatting standards

solely because those materials are retained or made available electronically: (1) faithful electronic reproductions of documents recorded or filed in the office of a county recorder, including recorded instruments, filed maps, and survey documents; and (2) engineering or architectural plans and drawings primarily prepared for construction, including sheets containing graphic plans, profiles, sections, diagrams, alignments, layouts, dimensions, and technical symbols. This subdivision applies without regard to the date the document was prepared, recorded, filed, or posted. Nothing in this subdivision limits otherwise applicable obligations to provide effective communication, reasonable accommodations or modifications, or access to information for persons with disabilities; nor does it alter the requirements of federal law.

B. Government Code § 11135

11135. (a) No person in the State of California shall, on the basis of sex, race, color, religion, ancestry, national origin, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, or sexual orientation, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state. Notwithstanding Section 11000, this section applies to the California State University.
(b) With respect to discrimination on the basis of disability, programs and activities subject to subdivision (a) shall meet the protections and prohibitions contained in Section 202 of the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132), and the federal rules and regulations adopted in implementation thereof, except that if the laws of this state prescribe stronger protections and prohibitions, the programs and activities subject to subdivision (a) shall be subject to the stronger protections and prohibitions.
(c) The protected bases referenced in this section have the same meanings as those terms are defined in Section 12926.
(d) The protected bases used in this section include a perception that a person has any of those characteristics or that the person is associated with a person who has, or is perceived to have, any of those characteristics.
(e) The technical accessibility-formatting exception for electronic records and construction plans described in Section 7405, subdivision (c), shall apply to electronic documents furnished by programs or activities subject to this section to the extent permitted by federal law. This subdivision does not reduce the protections against discrimination established by subdivisions (a) and (b), nor does it excuse compliance with effective-communication and reasonable-modification obligations under the Americans with Disabilities Act or any more protective applicable requirement.

C. Government Code § 11546.7

11546.7. (a) Before July 1, 2019, and before July 1 biennially thereafter, the director of each state agency or state entity, as defined in subdivision (e) of Section 11546.1, and each chief information officer appointed under Section 11546.1, shall post on the home page of the state agency's or state entity's Internet Web site a signed certification from the state agency's or state entity's director and chief information officer that they have determined that the Internet Web site is in compliance with Sections 7405 and 11135, and the Web Content Accessibility Guidelines 2.0, or a subsequent version, published by the Web Accessibility Initiative of the World Wide Web Consortium at a minimum Level AA success criteria.
(b) The Director of Technology shall create a standard form that each state agency's or state entity's chief information officer shall use to determine whether the state agency's or state entity's Internet Web site is in compliance with the accessibility standards specified in subdivision (a).
(c) For purposes of the certification required by subdivision (a), an agency's website shall not be considered noncompliant solely because it makes available electronic materials excluded from proactive technical formatting requirements under Section 7405, subdivision (c), provided that the agency otherwise complies with applicable state and federal nondiscrimination and effective-communication requirements. This subdivision does not independently authorize an exception to a federal requirement.

Federal Law — Proposed Revisions

28 CFR § 35.201 (Exceptions to the requirements of 28 CFR § 35.200).

28 CFR § 35.201 — Exceptions

§ 35.201 Exceptions.

The requirements of § 35.200 do not apply to the following:
(a) Archived web content. Archived web content as defined in § 35.104.
(b) Preexisting conventional electronic documents. Conventional electronic documents that are available as part of a public entity's web content or mobile apps before the date the public entity is required to comply with this subpart, unless such documents are currently used to apply for, gain access to, or participate in the public entity's services, programs, or activities.
(c) Content posted by a third party. Content posted by a third party, unless the third party is posting due to contractual, licensing, or other arrangements with the public entity.
(d) Individualized, password-protected or otherwise secured conventional electronic documents. Conventional electronic documents that are:
(1) About a specific individual, their property, or their account; and
(2) Password-protected or otherwise secured.
(e) Preexisting social media posts. A public entity's social media posts that were posted before the date the public entity is required to comply with this subpart.
(f) Recorded and filed public records. Faithful electronic reproductions of documents recorded or filed in the office of a county recorder or equivalent public recording office, including instruments affecting title, deeds, easements, maps, plats, records of survey, and other filed technical records, regardless of the date of creation, recordation, filing, digitization, or electronic publication. This exception applies to the reproduced record itself and does not exempt the public-facing search interface, navigation functions, transaction forms, or other web content used to access the record.
(g) Construction engineering and architectural plans. Engineering and architectural plans, construction drawings, plan sheets, specifications consisting principally of drawings, and related graphic technical documents prepared primarily to guide, authorize, inspect, or document construction, including graphic diagrams, layouts, profiles, alignments, cross sections, dimensions, design details, and technical symbols, regardless of their creation or publication date. This exception applies to the plan or drawing itself, rather than to ordinary narrative documents, application forms, notices, or accessible web interfaces accompanying the plan.
Federal regulatory source: https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-H/section-35.201
Drafting note: The proposed exceptions would not remove separate effective-communication and reasonable-modification obligations under Title II, including 28 CFR § 35.160. The existing provisions quoted above have not been deleted.

County Engineers Association of California

LEGISLATIVE PROPOSAL ACTION REQUEST FORM

2027–2028 Legislative Session

Please return this form by 5pm, October 16, 2026

For your proposal to be considered, please respond to all questions included in this form. Proposals must be submitted to CEAC through your Public Works Director or Department Head. Please submit this form to Merrin Gerety at mgerety@counties.org

Proposals will be referred to the appropriate policy committees and considered during the 2026 CSAC Annual Meeting, November 30–December 4, 2026.

Contact Name: Robert W. Bronkall

County: Humboldt County

Position: County Surveyor

Phone: 707.445.7205

Email: bbronkall@co.humboldt.ca.us

Brief Description of Legislative Proposal

Establish a CEAC policy supporting active participation by county engineers, county surveyors, and other appropriate county representatives in the California Geographic Information Association (CGIA), the California Geographic Information Coordinating Council (CGICC), the California Chapter of the Geospatial Professional Network (CalGPN), and other relevant statewide geospatial professional organizations.

Geographic Information Systems (GIS) and professional land surveying share substantial areas of technical practice. California Business and Professions Code Section 8726 defines the practice of land surveying broadly, encompassing numerous activities also performed within the GIS profession. This overlap has generated disagreements regarding the appropriate scope of professional licensure and proposals to amend California's Professional Land Surveyors' Act.

Participation in these organizations would provide county engineers and surveyors with opportunities to better understand the concerns of GIS professionals, contribute their expertise to discussions concerning professional practice and public protection, and participate in the development and evaluation of proposed legislative and regulatory changes.

The policy is intended to encourage communication, cooperation, and informed participation while protecting the public interest and recognizing the statutory responsibilities of licensed land surveyors. Adoption of this policy would not constitute endorsement of any particular proposed amendment to California law.

I. BACKGROUND INFORMATION

A. Problem

(1) What problem does the proposal address?

Geographic Information Systems (GIS) and professional land surveying have evolved into closely related disciplines that share many technologies, methods, and applications. California Business and Professions Code Section 8726 defines the practice of land surveying broadly, including activities involving topographic mapping, geodetic measurements, property boundaries, fixed works, and the creation and modification of

certain geospatial data. Many of these activities overlap with work performed by GIS professionals.

This overlap has generated disagreements regarding the appropriate scope of professional licensure and the distinction between regulated land surveying and GIS activities that may be performed without a land surveyor's license. These disagreements have resulted in regulatory enforcement actions, litigation, and proposals by GIS professional organizations to amend California's Professional Land Surveyors' Act.

The litigation in Crownholm v. Moore illustrates this conflict. Although the litigation concluded without invalidating California's existing licensing requirements, it did not resolve the broader policy questions regarding the appropriate division of responsibilities between licensed land surveyors and GIS professionals.

Proposals to modify the statutory definition of land surveying could have significant consequences for county governments, which rely extensively on both licensed surveying services and GIS technology for infrastructure management, public works, land records, mapping, and other governmental functions.

County engineers and surveyors have substantial practical experience with the technical, legal, and public-safety considerations underlying these activities. However, without meaningful participation in statewide GIS professional organizations, their perspectives may not be adequately represented in discussions concerning potential legislative changes.

The problem addressed by this policy is therefore the need for greater communication, cooperation, and informed participation between county engineering and surveying professionals and the broader GIS community, particularly as proposals emerge that could affect professional responsibilities, regulatory standards, and public protection.

(2) Does the proposal address a problem of statewide significance?

Yes. The relationship between professional land surveying and Geographic Information Systems (GIS) is a matter of statewide significance because California's Professional Land Surveyors' Act applies uniformly throughout the state, while county governments rely extensively on both disciplines to carry out their statutory and administrative responsibilities.

California's 58 counties maintain and utilize geospatial information for land records, transportation infrastructure, public works, flood control, emergency management, planning, and numerous other governmental functions. Many of these activities involve geographic information derived from surveys or developed using technologies and methods that overlap with those regulated under Business and Professions Code Section 8726.

The statewide significance of this issue is demonstrated by efforts within California's GIS professional community to revise the statutory definition of land surveying. These efforts seek to clarify which activities require professional licensure and which may be performed by GIS professionals without a land surveyor's license. Because such changes would apply statewide, their consequences could extend to county surveying and engineering operations throughout California.

The Crownholm v. Moore litigation further demonstrates that disagreements concerning the scope of professional surveying practice are not merely theoretical. Although the existing statutory framework remains in effect, the underlying questions concerning the relationship between GIS practice and professional licensure continue to be subjects of discussion and proposed legislative reform.

County governments have a substantial interest in ensuring that any changes to professional licensing

requirements appropriately recognize the capabilities of GIS professionals while preserving necessary standards of accuracy, professional accountability, and public protection.

Active participation by county engineers and surveyors in statewide GIS organizations would facilitate communication among these disciplines, provide opportunities to evaluate proposed changes before they are introduced as legislation, and help ensure that the practical needs and statutory responsibilities of California counties are considered in statewide policy discussions.

(3) Have counties been involved in litigation regarding this problem?

Although counties were not named parties, Crownholm v. Moore, 92 F.4th 833 (9th Cir. 2024), illustrates the legal and regulatory issues surrounding the overlap between GIS activities and the licensed practice of land surveying. The litigation challenged California's application of professional surveying licensing requirements to the preparation of certain site plans by an unlicensed practitioner. The Ninth Circuit upheld the application of the state's licensing requirements, and the U.S. Supreme Court subsequently declined review, leaving the existing statutory framework intact. Although the case did not directly involve county governments, its implications extend to counties that employ GIS professionals, provide surveying services, and rely on geospatial information for public works, land records, infrastructure management, and other governmental functions.

(4) Other source materials documenting the problem

1. California Business and Professions Code §8726: Defines the practice of land surveying, including activities involving topographic mapping, geodetic measurements, property boundaries, fixed works, and certain geospatial data.
2. Crownholm v. Moore, 92 F.4th 833 (9th Cir. 2024): Addresses the application of California's professional land surveying licensing requirements to site plans prepared by an unlicensed practitioner.
3. Bruce Joffe, Draft Project Outline for Changing California's Statutes Defining the Practice of Survey (revised September 21, 2025): Documents concerns within the GIS professional community regarding existing licensing requirements and outlines proposed statutory revisions intended to distinguish regulated surveying from other GIS mapping activities.
4. National Council of Examiners for Engineering and Surveying (NCEES), Model Law: Provides a national model for defining and regulating professional surveying practice and serves as a reference in discussions concerning the appropriate scope of surveying licensure.

B. Interested Parties

(1) Interested counties, organizations, or individuals

The issue is of potential interest to all 58 California counties, particularly County Surveyors, County Engineers, Public Works Departments, and county GIS programs. Relevant professional and governmental organizations include the County Engineers Association of California (CEAC), California State Association of Counties (CSAC), California Land Surveyors Association (CLSA), California Geographic Information Association (CGIA), California Geographic Information Coordinating Council (CGICC), California Chapter of the Geospatial Professional Network (CalGPN), and the California Board for Professional Engineers, Land Surveyors, and Geologists (BPELSG). These organizations represent or serve professionals and public agencies whose responsibilities may be affected by discussions concerning the appropriate scope of land surveying licensure and GIS practice.

(2) Sources of information

The California Board for Professional Engineers, Land Surveyors, and Geologists (BPELSG) is a primary source of information concerning the interpretation and enforcement of California's Professional Land Surveyors'

Act. The California Land Surveyors Association (CLSA) and County Engineers Association of California (CEAC) can provide perspectives on professional surveying responsibilities, public protection, and county operations. The California Geographic Information Association (CGIA) and California Chapter of the Geospatial Professional Network (CalGPN) can provide information regarding GIS professional practices, regulatory concerns, and proposed legislative changes. Individual county surveyors, county GIS managers, and representatives of these organizations can provide practical examples of how existing licensing requirements affect governmental geospatial activities.

(3) Likely supporters and opponents

The proposed policy encouraging greater participation and communication among county engineering, surveying, and GIS professionals may receive support from organizations representing these disciplines, including CEAC, CLSA, CGIA, and CalGPN. However, the underlying issues concerning the scope of professional licensure are contentious and have generated strongly held positions within the surveying and GIS communities. Some stakeholders may view discussions of potential changes to the Professional Land Surveyors' Act as a threat to established professional responsibilities, public protection, or the integrity of the licensing system, while others may regard the existing regulatory framework as unnecessarily restricting legitimate GIS activities. Consequently, even a policy intended primarily to encourage dialogue and cooperation may encounter significant resistance from individuals or organizations concerned that participation could lend legitimacy to legislative proposals they oppose. The proposed policy does not endorse changes to existing licensing requirements but recognizes the importance of engaging constructively with differing perspectives while preserving CEAC's independence in evaluating future legislative proposals.

(4) Other affected parties

The proposed policy could affect county Public Works Departments, County Surveyors, county GIS programs, municipal governments, state agencies, and professional organizations representing surveying, engineering, and GIS practitioners. Greater participation and communication may benefit these stakeholders through improved understanding of professional responsibilities, regulatory requirements, and the practical consequences of proposed legislative changes. The California Board for Professional Engineers, Land Surveyors, and Geologists (BPELSG) also has an interest because proposed changes to the definition of land surveying could affect its regulatory responsibilities. Although the participation policy would not itself alter existing law or professional licensing requirements, some stakeholders may perceive increased engagement with organizations advocating legislative reform as potentially adverse to their professional or institutional interests. The policy is intended to facilitate informed discussion without committing CEAC or its members to any particular legislative position.

II. PROPOSAL

A. Existing Law

(1) What are the statutory provisions currently applicable to the proposal?

California's Professional Land Surveyors' Act (Business and Professions Code §§8700–8805) establishes the licensing requirements and regulates the practice of professional land surveying. Section 8725 requires licensure for persons practicing land surveying, subject to statutory exceptions, while Section 8726 defines the activities constituting that practice. These include boundary determination, topographic and geodetic surveying, locating fixed works, preparing certain maps and electronic geospatial data, and rendering statements concerning mapping accuracy.

Section 8725.1 expressly applies professional land surveying licensing requirements to state and local government agencies and requires the designation of an individual authorized to practice land surveying who

is responsible for professional surveying work. Section 8726(c) also establishes requirements for governmental review, approval, or examination of documents involving regulated surveying activities.

These provisions are particularly relevant to county governments because many activities performed by GIS professionals overlap technically with activities defined as professional land surveying. Although the proposed CEAC policy does not seek to amend existing law, these statutes provide the regulatory framework underlying ongoing discussions concerning the relationship between GIS practice and professional land surveying.

(2) Relevant case law

As discussed in Sections I.A.(1) and I.A.(3), Crownholm v. Moore illustrates the regulatory issues arising from the overlap between professional land surveying and GIS practice. However, the present proposal does not seek legislative changes or modification of existing licensing requirements. Rather, it establishes a CEAC policy encouraging greater participation and engagement with GIS professional organizations to improve communication, mutual understanding, and informed consideration of future legislative proposals.

(3) Why is existing law inadequate?

This proposal does not seek to amend existing law or suggest that California's current professional licensing requirements are inadequate. Rather, it addresses the need for greater engagement between county engineering and surveying professionals and organizations representing the GIS community. As discussed in earlier sections, the overlapping nature of these disciplines has generated differing perspectives concerning professional responsibilities and potential legislative reforms. The proposed CEAC policy would encourage participation in these discussions to promote mutual understanding, protect the public interest, and ensure that county perspectives are considered in the development of future legislative proposals.

B. Suggested Legislation

(1) Describe the specific bill proposal

No legislation is proposed. This request seeks adoption of a CEAC policy encouraging active participation by county engineers, county surveyors, and other appropriate representatives in statewide GIS professional organizations, including CGIA, CGICC, CalGPN, and similar organizations. The purpose is to promote professional communication, mutual understanding, and informed engagement in discussions concerning GIS practice, professional land surveying, and potential legislative or regulatory changes. Participation would not imply CEAC's endorsement of any particular legislative proposal or modification of existing professional licensing requirements.

(2) Do similar provisions exist in other California laws?

Not applicable. This proposal seeks adoption of a CEAC policy encouraging participation in professional organizations and does not propose new legislation or amendments to existing California law.

(3) Hypothetical application

Under the proposed policy, county engineers and surveyors could participate in meetings, joint working groups, technical sessions, and educational programs sponsored by statewide GIS professional organizations. For example, county representatives could collaborate with GIS professionals to examine proposed amendments to Business and Professions Code Section 8726, exchange perspectives on professional responsibilities and public protection, and identify areas of common interest. Joint technical sessions could also address subjects such as geodetic reference systems, including the Scripps Orbit and Permanent Array Center (SOPAC) and California Real Time Network (CRTN), mapping accuracy, geospatial data standards, and the appropriate use of survey-derived information in GIS applications. These activities

would promote cooperation and mutual understanding across disciplines without obligating CEAC to endorse any particular legislative or regulatory proposal.

C. Fiscal Impact

(1) Fiscal impact on counties

The proposed policy is expected to have minimal direct fiscal impact on counties. Participation may involve modest expenditures for staff time, professional memberships, training, or occasional travel, but would not create mandatory financial obligations. Potential benefits include improved technical knowledge, increased operational efficiency, greater interagency coordination, and opportunities to share resources and expertise. These benefits may offset participation costs and contribute to more effective county surveying, engineering, and GIS operations.

(2) Financial impact on other persons or organizations

The proposed policy is not expected to have any significant financial impact on other public or private organizations. Participation would be voluntary and would not impose new regulatory requirements or financial obligations. Increased collaboration may provide indirect benefits through improved information sharing, professional development, and opportunities for greater efficiency in geospatial activities.

D. History

(1) Legislative history

Not applicable. This proposal seeks adoption of a CEAC policy encouraging professional engagement and collaboration. No legislative changes are proposed, and the policy has not been introduced in the Legislature.

(2) Judicial or executive resolution

Not applicable. The proposed policy concerns voluntary professional engagement and cooperation rather than a legal dispute requiring judicial or executive action. CEAC can implement the policy through its existing organizational processes without changes to California law or intervention by the courts or executive branch.

E. Public Policy

(1) Public policy reasons for and against

The principal public policy justification for this proposal is that improved communication, cooperation, and mutual understanding among surveying, engineering, and GIS professionals serve the public interest. Protection of the public is the fundamental purpose of professional licensure and a central responsibility of government. Meaningful engagement among these disciplines can promote better technical practices, informed policymaking, efficient use of public resources, and appropriate professional accountability. Although some stakeholders may be concerned that participation in organizations advocating changes to professional licensing laws could be perceived as support for those changes, engagement does not imply endorsement. Rather, constructive dialogue provides an opportunity to understand differing perspectives, communicate concerns, and develop informed positions that prioritize public protection. Ultimately, better communication among the professions and public agencies responsible for geospatial information advances the shared public-interest objectives of both professional regulation and government service.

(2) Effect on related CEAC public policies

No direct impact on other existing CEAC public policies or initiatives is anticipated. The proposed policy is intended to encourage professional engagement and cooperation and does not modify or conflict with existing CEAC policy positions.

Considered by the 27/28 Policy Priority ad hoc committee for Land Surveying, but not completed in time for final consideration:

Justification for Funding and Grant Programs to Archive and Digitize Historical Records

Local agencies across California maintain extensive collections historical road files, survey records, subdivision maps, right-of-way documents, Board of Supervisors actions, and other foundational public works archives. Many of these records exist only in fragile paper formats, stored in aging facilities, and are vulnerable to deterioration, loss, or disaster. Despite their importance, most local agencies lack sustainable funding to preserve, organize, and provide public access to these legacy records. The creation of dedicated funding streams and grant programs is necessary to ensure that these historically significant materials are preserved for future generations and remain accessible to researchers, and the public.

While Government Code § 26158 authorizes counties to fund archival activities through Recorder-imposed fees (up to $3 per document), not all counties can generate sufficient revenue, especially smaller or rural counties.

Investment in archival and digitization programs is critical to safeguarding the historical record, supporting government operations, improving public transparency, and ensuring continuity of essential information. Establishing robust funding and grant opportunities will empower local agencies to fulfill their statutory responsibilities, enhance public service, and preserve the legacy of California's transportation and infrastructure history.

State has Historical Preservation Committee to be supported by BOS.

Considered by the 27/28 Policy Priority ad hoc committee for Land Surveying, but not completed in time for final consideration:

PROPOSED STATUTORY REVISION

Certificates of Correction
Cross-Reference to Original Recorded Maps

Legislative Proposal:

Confer with Recorder's offices to evaluate a revision that would allow for certificates of correctio to be attached to or noted within original map documents.

Existing law provides procedures for correcting recorded subdivision maps and Records of Survey. However, a separately recorded Certificate of Correction may not be readily apparent to a person reviewing the original recorded map.

This proposal would require county recorders to associate a recorded Certificate of Correction with the original map, either by attaching the certificate to the map record or by placing a notation on the map identifying the certificate by its recording document number.

The purpose is to improve public access to land records, facilitate identification of recorded corrections, promote consistency among counties, and reduce the potential for reliance on an original map without awareness of a subsequently recorded correction.

The proposed procedure would be administrative in nature and would not independently modify the original map, expand the permissible scope of a correction, or change existing requirements for review, certification, and recordation.

The proposed changes Government Code § 66472 and Business and Professions Code § 8770.5 are as follows in red:

1. Government Code § 66472

The amending map or certificate of correction certified by the county surveyor, city surveyor, or city engineer shall be filed or recorded in the office of the county recorder in which the original map was filed. Upon that filing or recordation, the county recorder shall index the names of the fee owners of the real property reflected on the original recorded map, and the appropriate tract designation shown on the amending map or certificate of correction in the general index and map index respectively. Upon recordation of a certificate of correction, the county recorder shall associate the certificate of correction with the original recorded map. The county recorder may accomplish this by attaching the certificate of correction to the recorded map or its electronic record, or by placing a notation on the recorded map or its electronic image identifying the certificate of correction by its recording document number. The notation shall be for reference purposes only and shall not alter the original map or the legal effect of the certificate of correction. Thereupon, the original map shall be deemed to have been conclusively so corrected, and thereafter shall impart constructive notice of all those corrections in the same manner as though set forth upon the original map.

2. Business and Professions Code § 8770.5

Existing text (black): Any record of survey filed under the provisions of this chapter may be amended to show any course or distance that was omitted therefrom, or to correct any error in: course or distance shown thereon, the description of the land which the record of survey comprised, lot numbers, street names, acreages,

identification of adjacent record maps, or the character of monuments being set, or to correct any other minor errors approved for correction by the county surveyor in the same manner that subdivision maps may be amended under the provisions of the Subdivision Map Act, Division 2 (commencing with Section 66410) of Title 7 of the Government Code. A certificate of correction recorded pursuant to this section shall be associated with the original recorded record of survey by the county recorder. The county recorder may accomplish this by attaching the certificate of correction to the original record of survey or its electronic record, or by placing a notation on the record of survey or its electronic image identifying the certificate of correction by its recording document number. The notation shall be for reference purposes only and shall not alter the original record of survey or the legal effect of the certificate of correction.

Considered by the 27/28 Policy Priority ad hoc committee for Land Surveying, but not completed in time for final consideration:

- **Gov. Code § 27584** authorizes counties to establish a Survey Monument Preservation Fund to finance retracement or remonumentation surveys on historical land divisions.
- **Gov. Code § 27585** authorizes county user fees (typically charged during grant deed recording) to finance that fund.

Suggested Legislative Amendment

Amend Government Code § 27584 to include disaster-related replacements:

Plain Text
§ 27584. [Fund purpose expanded]
(a) The board may establish a survey monument preservation fund to pay necessary expenses incurred or authorized by the county surveyor in any retracement or remonument survey of major historical land division lines upon which later surveys are based, including—but not limited to—government section lines, rancho lines, grant lines, rancho section lines, acreage subdivision lot lines, and subdivision boundary lines within the county.
(b) Notwithstanding subdivision (a), the fund may also be used to:
(1) replace or re-establish survey monuments that have been destroyed, displaced, damaged, disturbed, or otherwise lost due to natural disasters, including but not limited to wildfires, floods, earthquakes, landslides, storms, or other declared emergencies; and
(2) cover costs associated with emergency monument preservation efforts initiated immediately after such disaster events.
(c) The county surveyor may delegate performance of these activities to a city engineer or contract surveyor, provided that their deliverables meet the county's standards and are recorded within 90 days with county survey records, in accordance with subdivision (a).

Amend Government Code § 27585 to clarify fund use and continuation:

Plain Text
§ 27585. [Funding mechanism & restrictions]
(a) For the limited purpose of financing the survey monument preservation fund per Section 27584, including disaster-driven replacements under subdivision (b) thereof, the board may impose a user fee not to exceed ten dollars ($10)... (we should try and increase this amount)
...
(c) No funds collected shall be transferred to any other fund or used for purposes other than those authorized by Section 27584, including disaster-related replacements per subdivision (b) thereof.

Define Key Terms

"Natural disaster" means any natural event such as wildfire, flood, earthquake, landslide, storm, or other officially declared emergency that destroys or damages survey monuments.
"Emergency monument preservation" means preemptive or reactive surveying actions undertaken immediately after a disaster to locate, protect, re-establish, or mark survey monuments.
Show more lines

Rationale & References

- Ensures funds are available when disasters compromise critical boundary markers.
- Builds on existing statutes that manage monument preservation funds while explicitly accounting for natural hazards.
- Encourages proactive steps immediately following disasters, facilitating faster rebuilding and boundary clarity.
- The approach mirrors longstanding California legislative precedent.

Implementation Considerations

- **Fee Authorization**: Ensure counties can continue levying fees under § 27585 to cover disaster-related costs.
- **Coordination Protocols**: Clarify operational roles among county surveyors, city engineers, and private surveyors.
- **Record-Keeping Timeline**: Maintain the 90-day recording requirement post-fieldwork.
- **Governor/County Emergency Declarations**: Tie disaster funding to officially recognized incidents.

Proposed Bill Outline

1. **Title**: *An Act to Amend § 27584 and § 27585 of the Government Code, Relating to Survey Monument Preservation Funds.*
2. **Sections**:
    - Section 1: Adds disaster-focused subdivisions to § 27584.
    - Section 2: Clarifies fund purposes in § 27585.
    - Section 3: Adds definitions for "natural disaster" and "emergency monument preservation."
    - Section 4: Specifies operative date (e.g., upon enactment).
3. **Legislative Findings**:
    - Disasters destroy or damage critical property markers.
    - This impairs property rights, rebuilding, and land-use planning.
    - Allowing fund use for disaster recovery supports reconstruction resilience.
