



ASSOCIATION OF
ENVIRONMENTAL
PROFESSIONALS

June 11, 2014

The Honorable Jerry Hill
Chair, Senate Environmental Quality Committee
State Capitol Sacramento, CA 95814

Re: Assembly Bill 543 (Campos) - Oppose

Dear Chairman Hill and Members of the Committee,

On behalf of the Association of Environmental Professionals (AEP), we appreciate the opportunity to provide comments on the proposed Assembly Bill 543 (Campos). While AEP supports AB 543's implicit goal of disseminating relevant information regarding projects to potentially affected communities, AEP regretfully opposes AB 543.

AEP is a non-profit organization of California's environmental professionals. AEP members are involved in every stage of the evaluation, analysis, assessment, and litigation of projects subject to the California Environmental Quality Act (CEQA). For over thirty years, AEP has dedicated itself to improving the technical expertise and professional qualifications of its membership, as well as educating the public on the value of California's laws protecting the environment, managing our natural resources, and promoting responsible land use and urban growth. AEP's membership is broad and diverse, incorporating representatives from public agencies, the private sector and non-governmental organizations.

AEP understands that AB 543 would require a lead agency to translate certain CEQA notices and summaries of CEQA documents in the event that: (1) a community of non-English speaking people comprises at least 25% of the population within a lead agency's jurisdiction; and (2) the project is proposed to be located at or near an area where those non-English speaking people comprise at least 25% of the residents of that area.

AEP believes that lead agencies are in the best position to know, understand, and be responsive to the concerns represented by their particular jurisdictions. Lead agencies should be free to elect to translate certain CEQA documents and/or notices into other languages, but should not be obligated to do so under CEQA.

Further, AEP is very concerned that AB 543 would inadvertently create additional grounds to legally challenge project approvals. For example, if there were inadvertent translation errors within the notices or CEQA document summaries required under AB 543, this would potentially be grounds for a reviewing court to set aside the project's approvals.

AEP appreciates the continued opportunity to comment on legislation with important impacts to CEQA. Should you have any questions or need additional information regarding our comments, please do not hesitate to contact Will Gonzales at will@gqhlobby.com or (916) 930 - 0796, or Steve Noack at snoack@placeworks.com or (510) 848-3815.

Sincerely,

C. Eugene Talmadge
AEP President
Association of Environmental Professionals

Cc: Assembly Member Nora Campos