



ASSOCIATION OF
ENVIRONMENTAL
PROFESSIONALS

August 28, 2017

Honorable Ricardo Lara
Chair, Senate Appropriations Committee
State Capitol, Room 2206
Sacramento, CA 95814

RE: Assembly Bill 1250 (Jones-Sawyer) – Oppose

Dear Chair Lara:

On behalf of the Association of Environmental Professionals (AEP), I must respectfully oppose Assembly Bill 1250 (Jones-Sawyer). AEP strongly supports the environmental protection and planning work done by public employees throughout the state and believes in maintaining the proper balance between public and private sector work. Unfortunately, we fear this bill does not strike that balance and would pose significant unintended consequences that will result in delays, increased costs, and burdensome red tape.

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 nongovernmental organizations.

AB 1250 would provide that a county may only contract for personal services currently or customarily performed by county employees when numerous conditions apply, including: the local agency clearly demonstrates that the proposed contract will result in actual cost savings to the county for the duration of the contract and proposals to contract out work shall not be approved solely on the basis that savings will result from lower contractor pay rates or benefits. To implement these regulations, significant new reporting requirements will need to be undertaken on every contract, even when it is only for short-term assignments due to growth in the community or a rush in permits and applications.

Unfortunately, despite the good intentions, this may lead to unintended consequences, especially as it relates to environmental review. Adding all the requirements contained in this bill will introduce new complexity to an already complex process and will likely steer some agencies away from contracting for environmental review services. Local Agencies need flexibility to face workload challenges and the

provisions of this bill would restrict that. The result will be longer delays to projects and, if county resources are stretched thin, it may also mean inferior documents that do not describe environmental impacts appropriately.

AEP is not advocating for the outsourcing of public jobs, and understands the importance of protecting public employees. However, for the above reasons, AEP does not believe this bill strikes an appropriate balance and respectfully requests a NO vote on AB 1250.

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 our Sacramento representative Matt Klopfenstein at matt@gqhlobby.com or (916) 930-0796, or the Chair of our Legislative Committee, Bill Halligan at whalligan@planningcenter.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'DM', with a long horizontal flourish extending to the right.

Devon Muto
President, AEP

Cc: Assemblymember Reginald Jones-Sawyer, Author
Members & Staff, Senate Appropriations Committee