

Date of Hearing: May 6, 2026

ASSEMBLY COMMITTEE ON APPROPRIATIONS
Buffy Wicks, Chair
AB 2152 (Mark González) – As Amended April 15, 2026

Policy Committee:	Natural Resources	Vote:	13 - 0
	Emergency Management		6 - 1

Urgency: No State Mandated Local Program: No Reimbursable: No

SUMMARY:

This bill makes an “essential local fire station projects” eligible for judicial streamlining under the California Environmental Quality Act (CEQA).

Specifically, this bill:

- 1) Makes an essential local fire station project, at the discretion of a lead agency, eligible for judicial streamlining pursuant to this bill if the lead agency makes, based upon substantial evidence in the record, all of the following determinations:
 - a) The project is not located on eight specified sites (for example, wetlands and lands under conservation easements).
 - b) The project will employ best practices, as compared to similar fire station projects previously reviewed under CEQA, to avoid or mitigate significant environmental effects, including those environmental effects from noise, traffic, and hazardous materials.
 - c) The project’s construction, rehabilitation, and maintenance contracts in excess of \$50,000 are covered by a project labor agreement, as defined.
- 2) Authorizes the lead agency, in making a determination under this bill, to rely on publicly available maps and data from state or federal agencies and provides that the lead agency shall not be required to prepare biological surveys, geotechnical studies, or other technical analyses.
- 3) Requires the lead agency to (a) maintain documentation supporting its determination as part of the record of proceedings for the project and (b) prepare and certify the record of proceeding pursuant to Public Resources Code section 21167.6.2 (which establishes an alternative, concurrent method for preparing the administrative record or record of proceedings for environmental reviews).
- 4) Requires the lead agency, upon making a determination that a project, activity, or approval is eligible for judicial streamlining pursuant to this bill, to file a notice of determination with the Office of Land Use and Climate Innovation, as specified.
- 5) Requires the Judicial Council, on or before July 1, 2027, to adopt rules of court that apply to any action or proceeding brought to attack, review, set aside, void, or annul the certification of an environmental impact report, mitigated negative declaration, or negative declaration for

an essential local fire station project, including any potential appeals to the court of appeal or the Supreme Court, to be resolved, to the extent feasible, within 365 calendar days of the filing of the certified record of proceedings with the court.

- 6) Defines an “essential local fire station project” or “project” to mean a project undertaken by a city, county, or local fire agency to plan, design, and acquire property for, and construct, rehabilitate, or maintain, a fire station.

FISCAL EFFECT:

- 1) Ongoing cost pressure (Trial Court Trust Fund, General Fund) of an unknown amount to the courts to process and hear CEQA challenges to essential local fire station projects on an expedited timeline. Expedited cases generally create costs and staffing pressures on the courts, as each review typically requires a judicial officer, research attorneys, a dedicated courtroom, and staff. Many previous bills authorizing CEQA streamlining have required a higher filing fee of \$180,000 to ensure the courts have the resources needed to timely adjudicate complicated CEQA cases. This bill does not provide the courts the authority to charge higher filing fees and does not offer the courts additional resources to handle the higher anticipated workload.

Actual costs will depend on the number of cases filed and the amount of court time needed to resolve each case. It generally costs approximately \$1,000 to operate a courtroom for one hour. Although courts are not funded on the basis of workload, increased pressure on the Trial Court Trust Fund may create a demand for increased funding for courts from the General Fund. The state budget provides annual General Fund backfills to the Trial Court Trust Fund to offset revenue reductions, totaling approximately \$117.3 million in 2025-26.

- 2) The Judicial Council estimates minor and absorbable costs to amend or adopt a new rule of court to include essential local fire station projects for expedited judicial review, although the council requests delayed implementation of one year to allow for the drafting, approval, and public comment process to adopt or amend a rule of court.

COMMENTS:

- 1) **Purpose.** According to the author:

Across our state, localities struggle to construct new fire stations due to rising costs, procedural delays, and, at times, CEQA litigation. Los Angeles is a prime example of what could happen across this state. In *The Tiara Group vs. City of Los Angeles*, a group of residents successfully delayed a fire station from being built for over 2 years – placing lives on the line and wasting nearly \$2 million of valuable taxpayer dollars. With the International Association of Fire Fighters determining that LAFD needs 62 new Fire Stations and 4,000 additional Firefighters, and the last attempted fire station built in LAFD being sued twice under frivolous lawsuits, now is the time to ensure our fire departments across the state have the streamlined process they need to bolster fire infrastructure.

- 2) **Background.** CEQA generally requires state and local government agencies to inform decisionmakers and the public about the potential environmental impacts of proposed projects, and to reduce those impacts to the extent feasible.

Generally, CEQA actions taken by a public agency may be challenged in superior court once the agency approves a project or determines to carry it out. CEQA appeals are subject to relatively short statutes of limitations. Under current law, a petitioner generally has 30 to 35 days from the time a public agency makes a CEQA decision to challenge the decision in court. Current law requires courts to give CEQA actions preference over all other civil actions. The petitioner must request a hearing within 90 days of filing the petition and, generally, briefing must be completed within 90 days of the request for hearing. There is no deadline by which the court is to render a decision. Over the past decade, the state has adopted several measures that permit cases involving CEQA to obtain preferred, fast-track treatment in the courts.

AB 900 (Buchanan), Chapter 354, Statutes of 2011, and SB 292 (Padilla), Chapter 353, Statutes of 2011, established expedited CEQA judicial review procedures for a limited number of projects. For AB 900, it was large-scale projects meeting extraordinary environmental standards and providing significant jobs and investment. For SB 292, it was a proposed downtown Los Angeles football stadium and convention center project achieving specified traffic and air quality mitigations. AB 900's provision granting original jurisdiction to the Court of Appeal was invalidated in 2013 by a decision in the Alameda Superior Court. Statute was subsequently revised to restore jurisdiction to superior courts and require resolution of lawsuits within 270 days, to the extent feasible.

As part of their expedited judicial review procedures, these bills required the lead agency to prepare and certify the record of proceedings concurrently with the administrative process and required the applicant to pay for it. Since 2011, several additional bills have provided similar project-specific concurrent preparation procedures. In addition, SB 122 (Jackson), Chapter 476, Statutes of 2016, established an optional concurrent preparation procedure for any CEQA project, subject to the lead agency agreeing, and the applicant paying the agency's costs. This bill requires resolution of lawsuits within 365, not 270, days.

This bill is sponsored by the California Professional Firefighters (CPF), which notes that an analysis by the International Association of Fire Fighters found wide swaths of Los Angeles do not have a fire station close enough for the Los Angeles Fire Department to meet the recommended four-minute response time no matter how quickly they deploy, "leaving citizens in numerous communities without the swift and effective public safety response that they deserve." CPF argues the construction of stations already represents a significant time and resource investment for departments and communities, "and while not every fire station construction project is impacted by CEQA some projects have been delayed for significant periods time with resulting costs."

Among others in opposition, the Western Electrical Contractors Association argues that by conditioning judicial streamlining on a project labor agreement, this bill "imposes a costly, restrictive mandate that will delay projects, reduce competition, and waste scarce taxpayer dollars."