

## **Proposed Amendments to SB 707**

### **Issue: Clarification of Language Requirements**

Under the bill, “applicable languages” are defined as those spoken jointly by 20 percent or more of the population in the city or county in which the eligible legislative body is located, who speak English less than “very well” and who jointly speak a language other than English, based on data from the most recent American Community Survey. Due to AC Transit’s unique jurisdictional boundary, which spans 13 cities, portions of two counties, and numerous unincorporated areas, it is unclear which jurisdiction(s) should be used to determine applicable languages. This definition raises significant uncertainty for AC Transit due to its boundary alignment. Further clarification is needed to eliminate any obstacles in interpreting and complying with the bill’s requirements.

### **Issue: Agenda Translation Requirements**

The bill’s language translation requirements raise practical implementation concerns. SB 707 mandates that agendas be translated into all “applicable languages,” defined as those spoken by at least 20% of the local population with limited English proficiency. This could lead to the translation of materials that are never actually requested or used. A request-based approach—similar to the existing accessibility reasonable accommodation processes—would offer a more balanced and feasible way to ensure accessibility.

Additionally, Section 54953.4 would require agencies to create and maintain translated versions of a public-facing webpage, with prominent links on the homepage for each applicable language. While AC Transit supports greater language access, this could pose practical challenges, especially on a homepage that is primarily designed to prominently feature rider alerts and service information. In addition, for organizations like AC Transit that use a third-party vendor to host and maintain their public meetings webpage, there will be additional costs associated with creating and maintaining multiple translated webpages. Because the bill requires only agendas to be translated into multiple languages, other meeting materials—such as staff reports, minutes, and meeting recordings—are excluded from this requirement. This limited scope may give the impression that the District is not fully complying with the law, potentially resulting in increased public inquiries, requests for translated materials, public scrutiny, and greater administrative burden. Additionally, Section 54953.4 applies solely to the agendas of the Board of Directors, meaning that agendas for the District’s other Brown Act bodies would continue to be produced in English only, further contributing to confusion and inconsistency in implementation.

Many users already rely on browser-based translation tools to navigate agency websites effectively. The District’s website and public meetings website already have this tool. Staff believes that this enhanced accessibility coupled with a request-based approach can be deployed to help balance accessibility goals with feasibility.

**Issue: Unofficial Agenda Translations**

AC Transit also requests clarification of the provision allowing the public to post their own translations of agendas. While we understand that AC Transit would not be held liable for inaccurate postings, this could result in confusion or the intentional dissemination of inaccurate information. Despite language in the bill that alleviates liability for local agencies, allowing outside parties to produce and post translated agendas at District offices will be viewed by the general public as officially sanctioned postings. This could lead to significant unfounded criticisms of the District and erosion of public trust if any problems arise from third-party translations. In addition, many agencies, including AC Transit, lack the physical posting space to accommodate multiple versions of the agenda. AC Transit suggests that the provision that allows third-party postings be removed from the bill. Of course, this would not prevent a third party from distributing their own translation at a meeting or elsewhere, but in this instance, there would be greater transparency as to who is producing and publishing the document.

**Issue: Implementation Timeline**

SB 707 is currently scheduled to take effect on January 1, 2026, affording agencies only a limited timeframe to implement substantial operational changes. This timeline poses particular challenges for agencies that rely on third-party vendors to host and maintain their websites and do not have funding for implementation within the current fiscal year. Should the bill advance, AC Transit respectfully requests that the implementation date be deferred to January 1, 2027, to provide adequate time for deliberate planning, appropriate budgeting, and full compliance.