



September 9, 2025

The Honorable Maria Elena Durazo
Chair, Senate Local Government Committee
State Capitol, Room 407
Sacramento, CA 95814

The Honorable Juan Carrillo
Chair, Assembly Local Government Committee
1020 N Street, Room 157
Sacramento, CA 95814

RE: AB 735 (Carrillo) and SB 415 (Reyes): Planning and zoning: logistics use developments: truck routes – Notice of SUPPORT (As Amended September 9, 2025)

Dear Senator Durazo and Assemblymember Carrillo,

The League of California Cities (Cal Cities), American Planning Association, California Chapter (APA California), California State Association of Counties (CSAC), and Rural County Representatives of California (RCRC) sincerely appreciate the commitment through AB 735 (Carrillo) and SB 415 (Reyes) to clean up the warehouse bill from last session (AB 98, Chapter 931, Statutes of 2024). In representing cities, counties and planners statewide, we are pleased to express our sincere appreciation of Assemblymember Carrillo and Senator Reyes for honoring their commitment to the address significant implementation problems created by AB 98.

Cal Cities, APA California, CSAC, and RCRC remain steadfast in our position – the warehouse clean-up is NOT optional. While we opposed AB 98, the clean-up legislation MUST move forward this year to ensure the law can be implemented successfully at the local level. These bills are consistent with the Senate’s request last session for clean-up legislation.

Effective January 1, 2025, AB 98 requires specific standards on new or expanded logistic use and warehouse developments where the development is within 900 feet of a sensitive receptor. The law requires all local governments to update their circulation elements by January 1, 2026 for the Warehouse Concentration Region and by January 1, 2028 for all other cities and counties statewide. This update will include logistic use development related information, truck routes, signage, parking, and idling requirements. AB 98 authorized the Attorney General to fine local jurisdictions up to \$50,000 every six months they are not in compliance with the law.

Cal Cities, APA California, CSAC, and RCRC support the following provisions that have now been amended into AB 735 and SB 415:

- Allows cities and counties not included in the Warehouse Concentration Region with logistic use developments to adopt an ordinance (instead of updating their circulation element) by January 1, 2028, and for smaller jurisdictions (cities under 50,000 and counties under 100,000 residents) to adopt an ordinance by January 1, 2030. This provides flexibility to most local governments throughout the state to meet the truck route planning requirements required pursuant to AB 98.



- Provides that jurisdictions who do not have logistic use developments in their jurisdiction are no longer mandated to comply with circulation element/ordinance adoption requirement. If a jurisdiction approves a logistics use development in the future, it would have to adopt an ordinance within two years of the project's approval. **This specifically addresses the Senate's request for clean-up legislation.**
- Protects cities and counties that are making a good faith effort to adopt an ordinance or update their circulation element to comply with AB 98. The bill requires the court to consider any mitigating circumstances delaying the jurisdiction from coming into compliance as a determination of whether the jurisdiction is making a good faith effort or is facing substantial undue hardships.
- Redefines the scope of facilities subject to the law, ensures that projects in rural areas have a permitting pathway, exempts seasonal agricultural facilities, and provides flexibility for local regulation of traffic from smaller agricultural and forestry-related facilities.

We thank the authors for honoring their commitments to clean-up AB 98 and we urge the Legislature to pass this critical legislation.

Sincerely,

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cc: The Honorable Juan Carrillo
The Honorable Eloise Gomez Reyes
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