

County Executive  
David Villanueva

Governmental Relations and  
Legislative Officer  
Elisia De Bord



## County of Sacramento

Board of Supervisors  
Phillip R. Serna, District 1  
Patrick Kennedy, District 2  
Rich Desmond, District 3  
Rosario Rodriguez, District 4  
Patrick Hume, District 5

April 11, 2025

Assemblymember Juan Carrillo  
1021 O Street, Suite 5610  
Sacramento, CA 95814

Senator Eloise Gomez Reyes  
1021 O Street, Suite 7210  
Sacramento, CA 95814

Re: AB 735 (Carrillo) and SB 415 (Reyes): Planning and zoning: logistics  
use: truck routes.  
Notice of Concerns, Seeking Amendments (As Amended March 26, 2025)

Dear Assemblymember Carrillo and Senator Reyes:

On behalf of the Sacramento County Board of Supervisors, I respectfully submit our concerns on AB 735 (Carrillo) and SB 415 (Reyes) and seek the following amendments. These bills are identified as the clean-up legislation for AB 98 (Chapter 931, Statutes of 2024).

Effective January 1, 2025, AB 98 requires specific standards on new or expanded logistic use and warehouse developments on existing and rezoned industrial sites, where the development is within 900 feet of a sensitive receptor. The law requires all local governments to update their circulation elements, for some jurisdictions as early as January 1, 2026, to include logistic use development related information, including truck routes, signage, parking, and idling, and authorizes the Attorney General to fine local jurisdictions \$50,000 every six months if they are not in compliance with the law.

While both AB 735 and SB 415 were initially amended on March 26, 2025, we submit our concerns position until both measures include CSAC's local government priorities as amendments for the AB 98 clean-up. These revisions will help ensure the law can be implemented effectively:

1. Allow flexibility for how cities and counties meet the truck route requirements, including through adopted ordinances or other plans, rather than the General Plan, to effectively implement these measures.
2. Provide a Good Faith Effort provision protecting local governments working in good faith to update their circulation elements from enforcement actions by the Attorney General.

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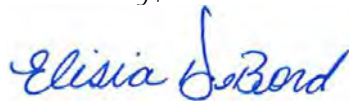
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3. Avoid unintended consequences that could pose impacts on local communities (please see specific priorities and redline revisions).
4. Support for general clarification to provisions and definitions to ensure clarity regarding zoning standards, land use authority, and consistency of terms in the law.

Thank you for your commitment to the clean-up legislation on AB 98. We urge you to incorporate these priorities as amendments to improve the implementation of AB 735 and SB 415 moving forward.

Thank you for your consideration. Please feel free to contact me at (916) 874-4627 or [deborde@saccounty.gov](mailto:deborde@saccounty.gov).

Sincerely,



Elisia De Bord

Governmental Relations and Legislative Officer

cc: Paul Ramey, Chief of Staff, Assemblymember Juan Carrillo  
Matthew Hamlett, Chief of Staff, Senator Eloise Gomez Reyes  
Linda Rios, Senior Consultant, Assembly Local Government Committee  
Anton Favorini-Csorba, Chief Consultant, Senate Local Government Committee  
Katie Kolitsos, Policy Consultant, Office of Speaker Robert Rivas  
Misa Lennox, Principal Consultant, Office of Senate Pro Tem Mike McGuire  
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