



# CITY OF MERCED

**MERCED**

April 15, 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,

The City of Merced respectfully submits our letter of concerns position on AB 735 (Carrillo) and SB 415 (Reyes) and is seeking 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 are submitting our letter of concerns position until both measures include the attached local government priorities as amendments for the AB 98 clean up. These modest 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.**
- 3. Avoid unintended consequences that could pose impacts on local communities.**
- 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.**



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The urgency of clean-up legislation is critical for the City of Merced. As a community experiencing rapid growth and increased pressure from logistics-related developments, AB 98's requirements pose significant implementation challenges. Merced is home to vulnerable populations who live near industrial zones, and we need clear, actionable guidance and flexibility to responsibly plan truck routes and mitigate environmental and traffic impacts. Without timely and practical amendments, AB 98 may hinder Merced's ability to keep pace with compliance while protecting public health, safety, and quality of life.

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.

For these reasons, the City of Merced expresses our concerns on AB 735 (Carrillo) and SB 415 (Reyes) and urges the following amendments be included.

Sincerely,

Matthew Serratto  
Mayor  
City of Merced

cc: The Honorable Anna Caballero, California State Senate  
The Honorable Esmeralda Soria, California State Assembly  
Raj Rakkar, Regional Public Affairs Manager, League of California Cities South  
San Joaquin Valley Regional Division, [rakkar@calcities.org](mailto:rakkar@calcities.org)  
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