



April 29, 2025

TO: The Honorable Eloise Reyes, California State Senate  
The Honorable Juan Carrillo, California State Assembly

FROM: California Business Properties Association  
AIR CRE  
Building Owners & Managers Association of California  
California Asian Chamber of Commerce  
California Business Roundtable  
California Forestry Association  
California Retailers Association  
California Grocers Association  
California Hispanic Chamber of Commerce  
California Manufacturers and Technology Association  
California Metals Coalition  
California Taxpayers Association  
California Trucking Association  
Can Manufacturers Institute  
City of Bakersfield  
City of Beaumont  
City of Eastvale  
City of Industry  
City of Merced  
City of Rancho Cucamonga  
Fresno County Economic Development Council  
International Warehouse Logistics Association  
Inland Empire Economic Partnership  
ICSC  
Institute of Real Estate Management of CA  
Invest Fresno  
Los Angeles Area Chamber of Commerce  
Los Angeles County Business Federation  
Madera Co. Economic Development Commission  
NAIOP California  
NAIOP Inland Empire Chapter  
NAIOP San Diego Chapter  
NAIOP Southern California Chapter  
Orange County Business Council  
Pacific Merchant Shipping Association  
San Diego Regional Chamber of Commerce  
Southern California Leadership Council  
Supply Chain Federation

RE: AB 735 (Carrillo), As Amended & SB 415 (Reyes), As Amended – AB 98 Warehouses - TECHNICAL FIX - NO POSITION - Suggested Amendments Provided

On behalf of the organizations listed above, we appreciate your efforts to address the uncertainty surrounding AB 98 (Carrillo & Reyes; Chapter 931, 2024) through AB 735 and SB 415. Ensuring clarity and predictability for impacted stakeholders is critical, and we recognize that these measures aim to refine technical issues related to implementation in a way that balances the intent of the original bill and regulatory objectives with practical application.

We appreciate the recent technical amendments made to AB 735 and SB 415, which represent a step in the right direction and reflect your continued commitment to addressing outstanding issues. AB 98 introduced significant new requirements for the logistics, warehouse, agricultural, and manufacturing sectors, and while the broader framework remains, key areas still require additional refinement. We remain committed to ongoing dialogue to resolve these issues and ensure effective implementation.

We look forward to continued discussions to ensure that necessary adjustments effectively address the following key issues:

1. Effective Dates and Exemptions: Clarify which current and future projects are governed by the law.
2. Redevelopment and Infill: Address the impact on infill, urban, and redevelopment projects, including a brownfield exclusion for existing industrial assets requiring updates.
3. Expansion Threshold: Clarify the language on existing building expansion, including the applicability of the 20% threshold and whether expansion includes demolition and reconstruction.
4. Buffers, Orientation & Internal Circulation: Provide clarity on buffers, building orientation, landscape and screening requirements, drive aisles, loading bays, cross-dock issues, and internal circulation.
5. Truck Routes: Resolve issues related to local government burdens, timeline concerns, rural routes, and enforcement mechanisms.
6. Exemptions for Critical Sectors: Consider clarifications or exemptions for industries that may not align with traditional logistics uses.
7. Housing Replacement: Clarify replacement and fair share requirements, particularly in distinguishing affordable versus market-rate housing and determining responsibility for development.
8. Enforcement: Define enforcement mechanisms to provide consistency and avoid unnecessary legal disputes.
9. Definitions & Consistency: Address ambiguous terms, ensure clarity for multi-building projects, and align dates and terminology for consistency.

Finally, we have provided under separate cover, a document that pulls together language from many different stakeholders that would help implement these technical fixes. The language has been reviewed by attorneys and local officials and companies that are directly involved in the entitlement processes to provide a base technical document that assures less technical issues in areas that get addressed moving forward.

We appreciate the opportunity to provide input on these legislative efforts and look forward to continued engagement to ensure that any adjustments made reflect a balanced and effective approach.

For additional information, please contact Skyler Wonnacott, California Business Properties Association (CBPA), at (916) 960-3951 or [swonnacott@cbpa.com](mailto:swonnacott@cbpa.com).

Thank you for your continued collaboration.

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