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WAREHOUSE, PUBLIC HEALTH, AND COMMUNITY PROTECTIONS: A POLICY ANALYSIS OF AB 98

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WAREHOUSES, PUBLIC HEALTH, AND COMMUNITY PROTECTIONS: A POLICY
ANALYSIS OF AB 98

By

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A capstone project submitted for Graduation with University Honors

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ABSTRACT

With nearly one billion square feet of warehouse space, California's Inland Empire (IE) has become the nation's e-commerce epicenter, handling 40 percent of the country's goods. While the logistics industry has expanded significantly in recent decades and emerged as the region's largest employment sector, its growth has contributed to poor air quality, community displacement, and labor issues. This project examines California Assembly Bill 98 (AB 98), a law intended to "raise the standards for warehouse development" and improve local communities' "quality of life." My study draws on interviews with state and local stakeholders, including elected officials, city and county officials, state lobbying groups, business associations, and environmental and labor advocacy organizations, to identify the bill's strengths and weaknesses and assess its early implementation. My research also compares pre-AB 98 local IE municipal codes with the new law to assess how local policies align with the early implementation of general plan updates.

My interview findings reveal five major themes across all stakeholder groups: (1) the appropriateness of AB 98's statewide standard; (2) lack of collaboration during the legislative process; (3) unintended consequences; (4) local implementation challenges; and (5) impacts on the local IE economy. The comparative analysis supports the need for AB 98's minimum standards in the IE, given lower thresholds and wide variation across jurisdictions. Additionally, analysis of early implementation shows that many jurisdictions did not meet the general plan update deadline. This research contributes to policy discussions on how state legislation can address the logistics industry's growing impacts while balancing economic growth, environmental sustainability, community protections, and labor rights in the IE.

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INTRODUCTION

The logistics industry, which manages the supply and transportation of goods, has expanded significantly in the Inland Empire (IE) over the past few decades (Bond, 2022). With approximately one billion square feet of warehouse space, the region has become an economic hub for goods movement in the e-commerce industry, hosting major companies such as Amazon, UPS, Target, Sketchers, Walmart, and Home Depot. Today, nearly 40 percent of the nation's goods travel through what were once open landscapes and farmlands in Riverside and San Bernardino Counties (Phillips, 2022). The IE's relatively inexpensive land and strategic location near the Ports of Los Angeles and Long Beach, which handle roughly one-third of all U.S. containerized imports and exports, have made the region a critical location for goods movement and storage ("The Value of Trade through the Port of Long Beach," 2025). As the IE's largest employment sector, the logistics industry also provides thousands of jobs to local workers, making it the region's economic driver (Moenius, 2024).

However, the expansion of warehouse development has increased congestion from heavy-duty trucks, releasing diesel emissions and worsening regional air quality. The proximity of warehouses to local communities, particularly low-income communities of color—as Latinos make up the largest share of the region's population—exposes residents to toxic air pollutants, leading to rising cases of childhood asthma and hospitalizations (Pope, 2000). In 2022, the American Lung Association ranked San Bernardino and Riverside Counties among the top ten in the nation for the worst ozone and particle pollution ("Inland Empire once again ranks as worst in nation for air quality," 2022). While environmental justice activists and community organizers have advocated for preventing prospective warehouse developments in their neighborhoods,

cities and counties continue to approve new projects at a high rate, further worsening the region's air quality.

In addition to air pollution, the logistics industry in the IE has contributed to regional employment and income inequalities (“State of Work in the Inland Empire Part II Pandemic, Polarization, Inflation, & Investment,” 2023). The IE's average wages are lower than those in other Southern California counties and the state average. In 2022, the median personal annual income for most jobs in the region was \$36,747—about \$10,000 less than the wage threshold for a “good job” or the amount needed to raise and support a family in California comfortably (“State of Work in the Inland Empire Part II Pandemic, Polarization, Inflation, & Investment,” 2023). Combined with lower educational attainment rates, the logistics industry's dominance has worsened employment and income inequities in the region.

Logistics industry jobs are often temporary, low-paying, and involve strenuous working conditions, raising labor rights and job security concerns (“State of Work in the Inland Empire Part II Pandemic, Polarization, Inflation, & Investment,” 2023). Many warehouse workers have organized walkouts through independent organizations to protest these issues, but unionizing is challenging because workers frequently face retaliation from employers. In 2022, for example, warehouse workers under IE Amazon Workers United (IE-AWU) organized a walkout to demand “pay increases, safer working conditions, and no retaliation for organizing” at Amazon's KSBD air cargo facility in San Bernardino (“State of Work in the Inland Empire Part II Pandemic, Polarization, Inflation, & Investment,” 2023). The IE-AWU alleged that Amazon had “interrogated employees” about their union participation, “issued write-ups to other employees in retaliation for wearing stickers in support of the wage increase,” and “surveilled workers engaged in organizing” (Hussain, 2022). The walkout led Amazon to implement some workplace

safety improvements, such as “increased cool-down breaks” and “more access to water, ice, and electrolyte packers,” along with a \$1.75 wage increase (Hussain, 2022). However, workers still earn a base hourly pay of \$19.75, which falls below California’s living wage (“State of Work in the Inland Empire Part II Pandemic, Polarization, Inflation, & Investment,” 2023).

The growth of the logistics industry has also displaced many low-income communities of color in the IE. One notable example is the Bloomington Business Park, a two-million-square-foot industrial warehouse park that was set to remove 117 homes and ranches in the unincorporated region of Bloomington in San Bernardino County (Plevin, 2024). The project was approved in 2022 by the County’s Board of Supervisors, and by 2024, it had displaced 100 homes during construction.

According to the environmental impact report, the park was reported to have “significant and unavoidable” impacts on air quality, but would provide 23,000 jobs to residents (Plevin, 2024). Howard Industrial Partners, the project’s developer, agreed to pay \$44.5 million in a deal to swap land with the Colton Joint Unified School District and build a new school for Zimmerman Elementary School on Hermosa Avenue (Whitehead, 2022). However, after several environmental and community groups filed lawsuits against the county, San Bernardino County Superior Court Judge Donald Alvarez ordered construction to halt, ruling that the county failed to comply with state environmental laws requiring full disclosure of the project’s ecological harms (Plevin, 2024).

To address the logistics industry’s negative impacts in the IE—including environmental pollution, labor rights issues, and community displacement—California Senator Eloise Gómez Reyes and Assembly Member Juan Carrillo introduced Assembly Bill 98 (AB 98) during the 2023-2024 legislative session to regulate local governments’ land-use and zoning authority over

warehouse developments. According to Reyes, who represents Senate District 29 in San Bernardino County, AB 98 aims to improve the “quality of life” for local IE communities by raising the “standards for warehouse development” in California and requiring “local agencies to make responsible decisions that promote economic development while maintaining or improving the quality of life for their constituencies” (“Bill Text - AB-98 Planning and zoning: logistics use: truck routes,” 2024).

While AB 98 was signed into law by California Governor Gavin Newsom in 2024, it was highly contentious because it was pushed through both chambers in the final days of the session, leaving lobbyists and stakeholders with limited time to effectively oppose or amend it. Furthermore, AB 98 is an important topic of research because it is the first piece of legislation to address the impacts of the logistics industry in the IE. Due to its late gut-and-amend process, it also contained ambiguities that required clarification in clean-up legislation during the 2024-2025 legislative session. An analysis of AB 98 and its implementation is crucial to identify its potential strengths and shortcomings. Moreover, this project contributes to early policy discussions on how state legislation can better regulate the logistics industry while balancing economic growth, environmental sustainability, and labor protections.

This paper reviews the legislative journey of AB 98 through the state legislature and highlights its key provisions. It then outlines the study’s methodology, which includes stakeholder interviews, a comparative analysis of local logistics regulations versus AB 98’s standards, and a review of general plan updates. The paper also discusses the amendments made by Senate Bill 415 (SB 415)—the legislation that clarifies and refines AB 98—and presents findings from these analyses. Finally, it evaluates AB 98’s strengths and weaknesses, addresses

implementation challenges, considers future state legislation for the logistics sector, explores the future of the IE's economy, and identifies areas for further research.

AB 98's Political Context & Legislative Process

AB 98 was the culmination of a years-long effort by Senator Gómez Reyes, who had previously introduced two bills to regulate the logistics industry's negative public health impacts while serving in the State Assembly before transitioning to the Senate in December 2024. In 2021, Reyes also introduced AB 1547, which would have authorized the State Air Resources Board (CARB) to regulate "indirect sources" of pollution, including warehouse facilities, rather than the state board ("Bill Text - AB-1547 Air pollution: warehouse facilities," 2021). AB 1547 required local governments to "identify and address the potential environmental impacts of a [warehouse] project" and "ensure public participation by residents affected." However, it was withdrawn before the Natural Resources Committee heard the bill—a common step when an author is not confident they have enough votes to pass the measure.

In 2023, Reyes introduced AB 1000, which sought to establish a "Good Neighbor Policy" prohibiting San Bernardino and Riverside Counties from approving warehouse developments within 1,000 feet of a sensitive area unless the project "imposes specified mitigation measures" ("Bill Text - AB-1000 Qualifying logistics use projects," 2023). AB 1000 would have imposed larger minimum distance requirements between warehouses and sensitive receptors than AB 98, but it failed to advance beyond the first committee review.

Given Reyes' previous efforts to pass legislation regulating the logistics industry, it is likely the gut-and-amend approach—a process in which noncontroversial bills are altered to include more controversial proposals in a last-ditch effort to secure passage—was used to ensure the passage of AB 98 and to prevent organized opposition. Initially, AB 98 was a cleanup bill

addressing an outdated 1982 law that allowed local governments to establish Cotton Pests Abatement Districts (CPADs) and manage cotton plant pests such as the pink bollworm. Since these pests have been eradicated, this authority was “no longer needed,” and the original version of AB 98 proposed removing CPADs in Orange, San Diego, and Ventura counties (“Bill Text - AB-98 Planning and zoning: logistics use: truck routes,” 2024). It passed the Assembly Committee on Agriculture with a 74-0 vote before advancing to the Senate. However, on June 27, 2024, the bill was ordered to the inactive file in the Senate at the request of California’s Senate President Pro Tempore Mike McGuire, temporarily halting floor consideration. This move is typically used when an author doesn’t want to proceed with a bill immediately but wants to keep it available for future consideration. The bill remained in the inactive file for approximately two months.

During this time, Assembly Member James Ramos—representing areas of San Bernardino County—introduced a competing bill, AB 1748, to regulate logistics use projects near sensitive receptors. Sponsored by the California State Council of Laborers and the Inland Empire Economic Partnership (IEEP), AB 1748 was considered more “business-friendly” than Senator Reyes’ previous bills and AB 98, offering fewer community protections for warehouses. The bill would have required a 300-foot buffer between warehouses larger than 400,000 square feet and sensitive receptors, but allowed exemptions if cities adopt an “industrial guideline framework, good neighbor policy, or sustainability ordinance” (“Bill Text - AB-1748 Logistics use projects: sensitive receptors,” 2023). Its requirements were also more limited and would have applied only to Riverside and San Bernardino Counties and their cities rather than the entire state. AB 1748 was opposed by several environmental and public health stakeholders, including

the Center for Community Action & Environmental Justice, Sierra Club California, and the American Lung Association, who argued that it failed to provide adequate health protections.

According to interviewed state officials, Assembly Speaker Robert Rivas ultimately wanted to focus on developing and passing one logistics-related bill during the 2023-2024 legislative session. Senator Reyes' AB 98 was selected because it offered stronger community and public health protections and maintained a more balanced approach to industry interests. After nearly two months, AB 98 was removed from the file, gutted, and amended to focus on regulating the logistics industry in the IE. Once it was ordered to second reading, it quickly moved through the Legislature—likely due to support from the Speaker's office, which designated it as the primary bill for addressing the logistics industry. AB 98 passed the Senate by a 22-16 vote and was ordered back to the Assembly on August 31, 2024. On the same day it passed the Senate, the Assembly concurred with the Senate's amendments and passed AB 98 in a 46-17 vote. Governor Newsom signed the bill into law on September 29, 2024 ("Bill Text - AB-98 Planning and zoning: logistics use: truck routes," 2024).

Ultimately, AB 98's original provisions on agricultural pest management were entirely removed and replaced with new regulations for the logistics industry—effectively making it a completely different bill. As shown by the dates of its passage in both chambers, these changes were introduced late in the legislative process and largely pushed through at the end of the session. Support from Speaker Rivas likely contributed to its quick passage on such a short timeline.

Legislative Summary of AB 98

AB 98 establishes statewide siting, design, and truck route standards for new and expanded warehouse developments to reduce air pollution and public health impacts on local

communities, particularly near sensitive receptors such as neighborhoods, schools, hospitals, daycares, parks, nursing homes, and other similar facilities. According to the bill summary, the law includes the following provisions:

- Requires warehouses to comply with “21st century warehouse” and “Tier 1 21st century warehouse” standards, including high-efficiency building design, renewable energy integration, and electrification. Standards include cool roofing, electric vehicle charging infrastructure, skylights or efficient LED lighting, electrical hookups for all loading bays serving cold storage, photovoltaic systems, battery storage, zero-emission forklifts, and small off-road equipment when feasible.
- Imposes minimum distance requirements between warehouse loading bays and sensitive receptors. On industrial-zoned land, loading bays must be located at least 300 feet from sensitive receptors and oriented away from their property lines. On non-industrial or rezoned land, loading bays must be located at least 500 feet from sensitive receptors and oriented away from their property lines. Truck entry, exit, and internal circulation must also be located away from sensitive receptors, with separate entrances for trucks via a commercial route and anti-idling signs posted at the site.
- New or proposed logistics developments within 900 feet of a sensitive receptor must include a physical buffer ranging from 50 to 100 feet, including “solid decorative wall, landscaped berm,” and evergreen trees to mitigate noise, light, and air pollution impacts.
- Cities and counties must update their general plan circulation elements to identify and enforce designated truck routes that maximize the use of highways, arterials, major thoroughfares, and minimize truck traffic near sensitive receptors.

- Requires a two-for-one replacement of any housing demolished for warehouse development with deed-restricted affordable housing and mandates relocation assistance of 12 months rent for displaced tenants.
- Stricter standards and shorter deadlines apply in designated warehouse concentration regions, including Riverside and San Bernardino Counties. These jurisdictions must update their circulation elements earlier than the rest of the state by January 1, 2026.
- The Attorney General may impose a fine on jurisdictions of up to \$50,000 every six months if these updates have not been made in “good faith.”
- Projects already in the entitlement or approval process before September 30, 2024, are largely exempt from the bill’s new requirements. Existing facilities are also protected from new sensitive receptors built after project approval.
- The South Coast Air Quality Management District (AQMD) must use data collected from air modeling analysis to evaluate the impact of air pollution on sensitive receptors from logistics use development operations in the Counties of Riverside and San Bernardino. The data will include the “relative pollution concentrations” from warehouses at varying distances from sensitive receptors. AQMD must provide an update on this data collection by January 2028 with a final report of findings in January 2033. AQMD also must establish a process for community input on how penalties from warehouse-related air quality violations are spent.

AB 98’s Clean-Up Legislation & SB 415’s Amendments

Before AB 98 passed, the bill’s authors committed to introducing clean-up legislation. According to several interviewed Sacramento officials, a couple of senators signed off on a list of amendments they wanted included in future clean-up legislation as a condition of supporting

AB 98. These changes were reportedly handwritten on a piece of paper behind closed doors. The bill's authors agreed to the terms, and AB 98 ultimately passed.

During the 2024-2025 legislative session, both authors of AB 98 introduced clean-up legislation in their respective chambers. Senator Reyes introduced SB 415, while Assembly Member Carrillo introduced AB 735. The companion bills contained nearly identical language and changes to AB 98, raising the question of why two clean-up bills were introduced. An interviewed legislative staff member explained that this approach was used to gather more stakeholder feedback, increase engagement in the legislature, and improve the likelihood of passage. Most importantly, the staff member noted that this approach was intended to increase transparency, as many stakeholders raised concerns about limited collaboration during AB 98's passage.

After moving through the same committees and both chambers, SB 415 was passed and signed by the Governor on October 3, 2025. According to the bill summary, SB 415 included the following changes to AB 98:

- Jurisdictions in non-warehouse concentration regions must adopt an ordinance by January 1, 2028, that complies with AB 98's requirements for truck routes, minimum distance between new or expanded warehouses and sensitive receptors, and buffering for warehouses within 900 feet of a sensitive receptor.
- Cities with populations of 50,000 or fewer people and counties with populations of 100,000 people or fewer will have until January 1, 2030, to adopt these ordinances.
- Cities and counties with no logistics developments as of January 1, 2025, are not required to adopt an ordinance. However, if they approve a new logistics development after that

date, they must comply with the section's requirements within two years of the project's final approval.

- Reaffirms that logistics use developments that entered the local entitlement process before September 30, 2024, or were approved before this chapter took effect, are exempt from AB 98's requirements.
- Logistics use developments beginning January 1, 2026, must comply with the "21st century warehouses" and "tier 1 21st century warehouses" standards at the time their building permits are issued.
- Logistics use development approvals must comply with existing laws protecting occupied or recently demolished residential units.
- Specifies road types for truck routes on commercial, industrial, and agricultural use roads when states or interstate highways are not utilized.
- The AQMD provisions were revised by removing the requirement to conduct air modeling research and instead allowing the use of various air monitoring data to evaluate pollution levels of warehouses near sensitive receptors in Riverside and San Bernardino Counties. The AQMD must submit a report on January 1, 2040.
- The California Highway Patrol (CHP) must provide free training for local law enforcement on truck route laws by January 1, 2026, with at least one certified enforcement officer per city and county by the time the circulation element or ordinance is adopted. However, no obligation for certification exists if the department lacks funding or has not provided training.
- The bill specifies that no state reimbursement is required to local agencies for costs incurred under AB 98's provisions.

METHODOLOGY

My study aimed to address three research questions:

1. Before AB 98 was passed, how stringent and consistent were local regulations governing logistics development across jurisdictions in the IE?
2. What are the strengths and weaknesses of AB 98, and how could the law be improved?
3. What challenges are local governments facing in implementing AB 98's requirements, particularly regarding general plan updates?

To address my research questions, I used a mixed-methods approach that combines interviews with local and state stakeholders and a comparative analysis of IE municipal codes against AB 98's core requirements. My data collection also assessed jurisdictions' progress toward meeting the January 1, 2026, deadline for general plan updates.

Study 1: Local Regulations Before AB 98 Codes

To address the first research question, I conducted a manual review of municipal codes in 10 local IE jurisdictions. The jurisdictions I included in my study are San Bernardino County, Riverside County, City of San Bernardino, City of Riverside, City of Moreno Valley, City of Fontana, City of Jurupa Valley, City of Rancho Cucamonga, City of Redlands, and the City of Perris. This analysis focuses on pre-AB 98 municipal codes and compares them with the law's minimum provisions, including distance requirements from sensitive receptors, buffering standards, and anti-idling signage.

Municipal codes include the laws and regulations that implement the city or county's general plan. They consist of more detailed policies on warehouse land use and zoning, development standards, and operational requirements. To assess alignment with AB 98 and the consistency of various policies, I reviewed municipal codes for provisions related to: (1) the 300-

to 500-foot minimum distance between warehouse loading bays and sensitive receptors, (2) the height and width of buffers for warehouses located within 900 feet of sensitive receptors, and (3) anti-idling limits and signage at warehouse parking lots and sites.

This approach is appropriate because it helps assess whether AB 98's passage is justified as a baseline standard. If local municipal codes vary widely before AB 98's passage or are less restrictive, this would support the bill's purpose of establishing a minimum standard or level of protection for IE communities. Conversely, the analysis may reveal that some cities or counties exceed AB 98's minimum distance, buffering, and anti-idling requirements. If so, this could suggest that AB 98's standards for industrial zoning policies should be more stringent. Thus, the most recent municipal codes before AB 98's implementation provide the best benchmark for comparison because AB 98 serves as a baseline protection and cities and counties can adopt stricter regulations for warehouses.

The analysis includes the most recent municipal codes available before September 2024 for Riverside County, San Bernardino County, and eight IE cities. Codes were accessed through the Municode Library and manually reviewed to identify relevant provisions. Because these policies are often located in different sections, such as "Land Use," "Zoning," "Vehicles and Traffic," or in specific zoning districts like business parks, the review focused on regulations most applicable to warehouse and logistics development near sensitive receptors. Identified policies were recorded in a Microsoft Excel spreadsheet and evaluated using a binary "Yes" or "No" system. A "Yes" designation indicates that a policy meets or exceeds AB 98's standards, and a "No" indicates it does not. Policies that included certain aspects of AB 98 but lacked other components, such as minimum buffer widths, were also categorized as "No." Table 1 defines the criteria used to assign "Yes" and "No" rankings relative to AB 98 standards.

Overall, this methodology provides a framework to assess variation in local regulations across the IE and to evaluate the extent to which AB 98 standardizes warehouse development policies.

Table 1. Local Regulations Before AB 98 Rating System

Criterion	AB 98 Standard	Rating: No (Below AB 98)	Rating: Yes (Meets/Exceeds AB 98)
Setbacks	Industrial-Zoned (warehouses $\geq$ 250,000): 300 ft. Non-Industrial Zoned (warehouses $\geq$ 250,000): 500 ft.	Industrial-Zoned (warehouses $\geq$ 250,000): < 300 ft. Non-Industrial Zoned (warehouses $\geq$ 250,000): < 500 ft.	Industrial-Zoned (warehouses $\geq$ 250,000): $\geq$ 300 ft. Industrial-Zoned (warehouses $\geq$ 250,000): $\geq$ 500 ft.
Buffer Dimensions	Industrial-Zoned: 10 ft high/50 ft. wide Non-Industrial Zoned: 10 ft. high/100 ft. wide	Industrial-Zoned: <10 ft. high/50 ft. wide Non-Industrial Zoned: <10 ft. high/100 ft. wide	Industrial-Zoned: $\geq$ 10 ft. high/50 ft. wide Non-Industrial Zoned: $\geq$ 10 ft. high/100 ft. wide
Anti-Idling & Signage	3-minute limit	< 3-minute limit	$\geq$ 3-minute limit

Study 2: Interviews

To answer my second and third research questions, I collected primary qualitative data through interviews with local and state stakeholders. These included politicians, IE city and county officials, business representatives, state lobbyists, and staff from environmental and labor rights organizations. This methodology was appropriate for several reasons.

First, because AB 98 was a late-gut-and-amend bill, many stakeholders were frustrated with its final version and offered suggestions for improvement. Two cleanup bills followed AB

98 during the 2024-2025 legislative session, providing a timely opportunity to capture stakeholder perspectives through interviews while amendments were actively considered and incorporated into cleanup legislation. Second, several provisions of AB 98, including updates to the general plan, did not take effect until January 2026, making it premature to evaluate the bill's outcomes in time for this project's deadline. Third, gathering diverse perspectives helped identify AB 98's strengths and weaknesses, potential implementation challenges, and common areas of interest among stakeholders.

All interview participants were identified from a publicly available list of organizations and groups that supported or opposed AB 98, including cities, counties, state lobbying groups, business associations, and environmental and labor organizations. To request an interview, I contacted participants by email or phone. Each interview lasted about an hour and was conducted either in person at a mutually agreed-upon location or via Zoom, with some follow-up questions sent by email. While questions varied by interview, all participants were asked about their organization's position on AB 98, the bill's implementation, and their suggested amendments to the bill. During each interview, I took notes on my laptop, which were later transcribed and safely stored in a folder. In total, 17 individuals representing a range of organizations participated in the study.

Many of my questions were guided by AB 98's bill analysis, which summarizes the proposed legislation, fiscal impacts, and stakeholders' arguments for and against the bill ahead of the California Assembly and Senate votes. Most stakeholders opposed AB 98, but different groups raised various concerns and reasons for their stance against the bill ("Bill Text - AB-98 Planning and zoning: logistics use: truck routes," 2024).

According to AB 98’s analysis by the Senate Appropriations Committee, counties and cities raised concerns about the high cost of updating their circulation elements in the general plan and about further restrictions on local land use authority (“Bill Text - AB-98 Planning and zoning: logistics use: truck routes,” 2024). As a result, several of my interview questions for local governments focused on these topics. Many IE counties and cities also expressed dissatisfaction with what they described as a “lack of collaboration” and with the bill’s late gut-and-amend process, which led me to ask about their experiences during that period and their collaboration with the bill’s authors. In addition to the concerns identified in the bill analysis, I developed questions about broader issues, including challenges associated with establishing new truck routes in cities and counties; potential effects of AB 98 on the number of warehouse project submissions following its passage; enforcement mechanisms for the new truck routes; perspectives on AB 98’s clean-up legislation; and views on what future state legislation related to the logistics industry should look like.

Lobbying groups, including the California State Association of Counties, the Rural County Representatives of California, and the California League of Cities, were asked similar questions, but those were geared toward the impact on all of California’s local governments, as AB 98 is a statewide mandate. In many bill analyses and committee votes, a major concern raised by these groups was that rural jurisdictions with few or no logistics developments are still required to update their general plans to reroute trucks under AB 98 (“Bill Text - AB-98 Planning and zoning: logistics use: truck routes,” 2024). Additionally, many rural areas have food processing facilities and warehouses that differ from logistics warehouses in the IE, but these facilities were not exempted or addressed in AB 98’s original language. Furthermore, my

questions for lobbying organizations focused on AB 98's impacts on local governments across the state and its potential unintended consequences and inconsistencies.

Environmental justice organizations also raised concerns about AB 98 and its implementation, though for reasons different from those of local governments. Many advocacy groups, including the People's Collective for Environmental Justice, argued that AB 98 sets a "harmful precedent" by undermining local efforts to adopt stronger regulations on the logistics industry, such as increasing minimum distances between warehouses and sensitive receptors ("Bill Text - AB-98 Planning and zoning: logistics use: truck routes," 2024). As with many other stakeholder groups, environmental justice advocates also expressed concerns about the lack of transparency and collaboration during the bill's development. My interview questions focused on the strengths and weaknesses of AB 98, community engagement between local governments and residents in updating general plans, perspectives on its clean-up legislation, and the most effective approaches to addressing the logistics industry's public health impacts moving forward.

In contrast to environmental justice groups, labor rights organizations have mixed responses to AB 98. Because it does not directly address labor conditions in warehouses, some groups took no formal position, others opposed it, and some supported it. By establishing stricter siting requirements for new and expanded warehouse projects, AB 98 limits the growth of the logistics industry and may help create opportunities for economic diversification in the IE. According to some labor rights groups, this could facilitate the emergence of new industries that offer higher wages and improved working conditions for employees. Therefore, labor organizations such as the California Federation of Labor Unions and the California State Council of Laborers supported the bill ("Bill Text - AB 98 Planning and Zoning," 2024). On the other hand, building trade unions representing construction workers opposed AB 98 because it would

limit the construction of new and expanded warehouses, thereby reducing employment and wages for their members. My questions for labor rights organizations focused on the shared goals of labor unions and AB 98 to diversify the IE's economy, strategies for attracting other industries to the region, and the role of future public policy in supporting this outcome.

One of the strongest oppositions to AB 98 came from business associations. Business leaders argue that the bill stifles economic growth and trade, threatens regional job opportunities, and could lead to higher consumer prices for goods, particularly amid the federal administration's inconsistent international tariff policies (Brennan, 2024). They contend that making warehouse development more costly and difficult in California will force businesses to relocate out of the state, placing California at a competitive disadvantage. E-commerce companies would also be restricted from expanding operations and from employing residents, hurting job opportunities for residents. Consequently, my questions for business associations focused on AB 98's effects on California and the IE's economic growth, international trade, the consequences of businesses relocating, out-of-state truck emissions standards, and proposed amendments to the bill's clean-up legislation.

Overall, AB 98 is unique not only because it is the first piece of legislation to address the logistics industry's impacts on the IE, but also because it faced widespread opposition from most stakeholder groups. Notably, both environmental justice groups and business organizations—whose viewpoints often conflict—expressed concerns and opposed the bill. This strong opposition made conducting stakeholder interviews especially important for understanding the range of perspectives on AB 98, identifying areas of conflict and common sources of interest, and examining the challenges of implementing the law at the local level.

Study 3: Early Implementation of AB 98

To address the third research question, this study analyzes the early implementation of AB 98 truck route updates and compliance with community engagement requirements during the development process. Because jurisdictions were not required to adopt updated truck routes until January 1, 2026, many updates are still in progress and not publicly available. Therefore, it is premature to evaluate the effectiveness of truck routes post-AB 98. However, examining the early implementation of AB 98 is crucial, as updating truck routes was a major concern for local governments in warehouse-concentrated regions facing a shorter compliance deadline.

This analysis focuses on the same 10 jurisdictions used in data collection for pre- and post-AB 98 local regulations for logistics uses. First, I reviewed each jurisdiction's local municipal code and general plan to identify pre-AB 98 truck route policies and maps. Next, I analyzed Board of Supervisors and City Council Meetings around the January 1, 2026, deadline for updates about AB 98 compliance, including ordinances or resolutions amending truck routes. This part involved reviewing meeting agendas, minutes, and recorded meetings and public comments. For jurisdictions without publicly available information, I contacted their Engineering and Public Works departments to obtain updates on truck route development and expected adoption timelines. Each jurisdiction was then categorized as "Yes" if truck routes were adopted on or before the deadline, "No" if adoption occurred after the deadline or had not yet occurred, or "N/A" if no information was available about the truck routes.

Finally, the study evaluates the accessibility of information on truck route updates and community engagement. Under AB 98, cities and counties must "provide opportunities for the involvement of citizens, California Native American Indian tribes, public agencies, public utility companies, and civic, educational, and other community groups through public hearings and any

other means the planning agency deems appropriate.” Although these requirements are broad, it is important to track whether jurisdictions demonstrate compliance through publicly accessible materials and community outreach. Materials reviewed included public hearings, dedicated webpages, and other outreach efforts.

Early implementation patterns can also identify potential challenges local governments face in adopting and enforcing new truck route policies, highlighting areas where AB 98’s implementation can be improved.

FINDINGS

Study 1: Local Regulations Before AB 98 Results

I reviewed the most recent general plans and municipal codes in 10 IE jurisdictions before AB 98’s passage. This allowed me to compare them with the specific elements required by AB 98 and determine whether local regulations met or exceeded AB 98’s standards. The requirements I evaluated included the minimum distance of 300 to 500 feet between warehouse loading bays and sensitive receptors, the height of physical buffers for warehouses located within 900 feet of sensitive receptors, and requirements for anti-idling signage at warehouse parking lots and sites.

Ultimately, local regulations varied widely across jurisdictions. None of the reviewed IE cities or counties met AB 98’s setback, buffer, anti-idling, and signage requirements between warehouses and sensitive receptors before AB 98’s passage. The City of Fontana was the only jurisdiction to meet one of AB 98’s standards (e.g., anti-idling and signage). Interestingly, while some jurisdictions updated their municipal codes to reflect AB 98’s standards, most still retained “dead” or outdated language from their previous code policies for logistics development. When pre-AB 98 municipal codes were unavailable, I relied on the most recent version, since it often

included “dead” language.

Table 2. Local Inland Empire Regulations vs. AB 98’s Standards

Local jurisdictions were assigned a binary rating of Yes or No. (Yes = Would Meet or Exceed AB 98; No = Below AB 98)			
Jurisdiction	Setback Distances	Buffers	Anti-Idling & Signage
San Bernardino County	No	No	No
Riverside County	No	No	No
City of San Bernardino	No	No	No
City of Riverside	No	No	No
City of Moreno Valley	No	No	No
City of Fontana	No	No	Yes
City of Jurupa Valley	No	No	No
City of Rancho Cucamonga	No	No	No
City of Redlands	No	No	No
City of Perris	No	No	No

I. Setback Distances

AB 98 establishes a uniform standard, requiring warehouses of 250,000 square feet or more on industrial-zoned land to maintain a 300-foot setback from the nearest sensitive receptor property line and a 500-foot setback for logistics uses on non-industrial land. By comparison, local policies ranged from 15 to 300 feet, depending on warehouse size and the zoning district. As shown in the table, no city or county met AB 98’s setback requirements before its passage.

Before AB 98, the City of Fontana and the City of Moreno Valley had the largest minimum setback distances. In Fontana, warehouses “larger than 400,000 square feet” in industrial districts must be located a “minimum of 300 feet away” from a sensitive receptor’s property line to the nearest dock door (“Fontana Municode Codification,” 2024). In Moreno Valley, setback requirements applied to warehouses in the business park and industrial districts.

For example, warehouses “greater than 50,000 square feet” in Light Industrial districts were required to maintain a minimum 250-foot setback from residential districts to “the truck court or loading area” (“City of Moreno Valley Code of Ordinances,” 2025). Additionally, under special site developments, “industrial buildings” next to residential areas must be set back at least the height of the building, with a minimum of 20 feet, and the first 10 feet of that setback must be landscaped (“City of Moreno Valley Code of Ordinances,” 2025).

Despite these comparatively stronger and larger setbacks, neither city fully meets AB 98 requirements. Fontana’s 300-foot setback aligns with the lower threshold of AB 98’s standards for industrial zones, but it applies only to larger warehouses (400,000 square feet) and not to those 250,000 square feet or more. Moreno Valley also requires a greater setback of 250 feet for smaller warehouses, but still falls short of the 300-foot setback under AB 98 in industrial zones. These municipal codes also do not clearly establish minimum setbacks between warehouses and sensitive receptors in non-industrial districts.

Several jurisdictions, including San Bernardino County, the City of Perris, and the City of Rancho Cucamonga, apply different setback distances based on building orientation, height, and yard location (front, side, and rear of warehouses). In San Bernardino County, setback requirements are based on zoning districts, with a general minimum of 15 feet between different land uses, but no specific standards for warehouses and sensitive receptors (“San Bernardino County, California Code of Ordinances,” 2024). In Rancho Cucamonga, setbacks increase to 45 feet when adjacent to the “residential property line or Interstate 15,” and industrial buildings taller than 35 feet in industrial zones require an additional foot of setback for each extra foot of height (“City of Rancho Cucamonga, CA Code of Ordinances,” 2026).

Prior to AB 98, Perris increased “front and street-side yards” by “ten feet for each additional ten feet” of warehouse height beyond 30 feet and allowed landscaping features—such as “employee parking, offices, landscaping”—to separate truck docks from sensitive receptors (“Perris, California - Code of Ordinances,” 2025). Thus, setbacks are based on building height and other landscaping features, such as parking lots, that can serve as setbacks.

Riverside County and the City of Jurupa Valley also permitted landscaping features in setback areas. For example, Riverside County required 20 to 25-foot setbacks between mini-warehouses and residential zones, allowing properties to use setback areas for parking, driveways, outdoor storage, or landscaping (“Riverside County, California - Code of Ordinances,” 2024). Jurupa Valley required a 50-foot setback where industrial properties border residential or commercial zones, with 20 feet required to be landscaped (“Jurupa Valley, California - Municipal Code,” 2024). Portions of the setback can also be used for parking or driveways. Therefore, setback requirements for cities and counties in general varied by the height of the logistics project, the zoning district, and the front, side, and rear yards.

The City of Redlands, City of San Bernardino, and City of Riverside had the lowest requirements because their codes lacked specific setback distances. For example, Redlands did not specify a numeric setback for warehouses from sensitive receptors. Instead, the city required warehouses to be located within one mile of a freeway entrance or exit “to the Interstate Freeway System (Interstate 10 and Interstate 210)” (“Redlands, CA Code of Ordinances,” 2026). San Bernardino lacked explicit setback language altogether, while Riverside required warehouses to be oriented away from sensitive receptors “to the maximum extent feasible” (“City of Riverside Code of Ordinances,” 2024). Before AB 98, these cities’ municipal codes were unclear about setbacks.

Overall, minimum setback requirements between logistics developments and sensitive receptors varied widely across cities and counties.

II. Buffers

Under AB 98, warehouses on industrial-zoned or rezoned land must erect a 10-foot-high, 50-foot-wide buffer from the sensitive receptor's property line, while those in a non-industrial zone must erect a 10-foot-high, 100-foot-wide buffer. These requirements apply to warehouses within 900 feet of a sensitive receptor, and the buffer must fully screen the project from that receptor.

However, local buffer requirements were consistently less stringent. Before AB 98, buffer requirements across jurisdictions typically ranged from under 10 feet in height to around 10 feet in width, with dimensions often varying based on the size of the logistics development. For example, in the City of Fontana, buffer requirements are tied to warehouse size: a 10-foot-high, 10-foot-wide landscaping buffer is required for warehouses "larger than 50,000 square feet," and a 10-foot-high, 20-foot-wide buffer is required for those "larger than 400,000 square feet" ("Fontana Municode Codification," 2024). While more specific and structured, these standards still fall short of AB 98's minimum width requirements.

Other jurisdictions imposed lower standards or lacked clear specifications for minimum buffer width requirements. The City of Riverside required an 8-foot-high buffer that fully screens adjacent uses, and Moreno Valley required a 6-foot-high buffer but did not specify buffer width requirements ("City of Riverside Code of Ordinances," 2024; "City of Moreno Valley Code of Ordinances," 2025). Additionally, Jurupa Valley specified an 8-foot-high buffer, but this applies to open outdoor storage areas, not warehouses specifically ("Jurupa Valley, California - Municipal Code," 2024). Riverside County required buffers between 6 and 8 feet tall, and the

City of Redlands required 10-foot-high buffers (“Riverside County, California - Code of Ordinances,” 2024; “Redlands, CA Code of Ordinances,” 2026). While Redlands would have met AB 98’s minimum height requirement, it did not specify a minimum width and therefore would not fully meet AB 98’s standards.

Only a few jurisdictions established both minimum height and width requirements for buffers. San Bernardino County required an 8-foot-high, 10-foot-wide buffer, and Rancho Cucamonga required an 8-foot-high, 6-foot-wide buffer between industrial and residential zones (“San Bernardino County, California Code of Ordinances,” 2024; “City of Rancho Cucamonga, CA Code of Ordinances,” 2026). However, these requirements still would not meet AB 98’s requirements. In addition, the City of Perris and the City of San Bernardino did not include a specific numerical height requirement for buffers before AB 98. Instead, Perris states only that industrial uses must be fully screened (“Perris, California - Code of Ordinances,” 2025).

Moreover, local buffer standards varied widely across jurisdictions and were consistently less stringent than those established under AB 98 in 2024 because minimum requirements fell below the minimum height threshold or lacked clear width specifications. Terminology also differed, with buffer requirements applied to different land uses, sensitive receptors, warehouse sizes, and, in some cases, more general commercial open spaces.

III. Anti-Idling Policies

Local anti-idling policies were the least developed and the most frequently omitted provision across jurisdictions. AB 98 limits heavy-duty truck idling to three minutes and requires posting of anti-idling limits at warehouse entrances and truck loading bays. While some cities had anti-idling regulations, they usually allowed up to five minutes, including San Bernardino County and the Cities of Riverside, Moreno Valley, Jurupa Valley, Perris, and Redlands.

In addition, many counties and cities, such as Riverside County and the Cities of San Bernardino and Rancho Cucamonga, did not include any anti-idling regulations in their general plans or municipal codes. Rancho Cucamonga only required heavy-duty diesel trucks that idle to install “electric truck hook-ups in docks, bays, and parking areas” but imposed no time restrictions (“City of Rancho Cucamonga, CA Code of Ordinances,” 2026). The City of Fontana was the only jurisdiction that limited truck idling to three minutes before AB 98 and received a “Yes” designation.

Study 2: Interview Findings

While each stakeholder group had different views on AB 98, several common themes emerged from my interviews. I identified the major shared pros, cons, and concerns of AB 98, including the benefits and disadvantages of AB 98’s statewide standard, limited collaboration during its legislative process, implementation challenges for local governments, unintended consequences resulting from its late gut-and-amend process, and its impact on the IE’s local economy. Many of these themes are complex because different stakeholders hold opposing views on whether these aspects of AB 98 are beneficial.

I. Statewide Standard

A major pro and con for many stakeholders was that AB 98 is a statewide mandate that applies to all California counties and cities. Before AB 98, California’s Attorney General, environmental justice groups, and local communities filed lawsuits against developers and local governments as a legal avenue to prevent the construction of warehouse projects in their neighborhoods. In July 2021, for example, the California Department of Justice sued the City of Fontana for approving a new warehouse development with a limited environmental review, alleging that it violated CEQA (“Attorney General Bonta Challenges Approval of Warehouse

Project,” 2021). However, these lawsuits typically focus on a single project rather than addressing the broader regional issue of the logistics industry in local communities across the IE.

Additionally, the logistics sector continues to expand in other parts of the state, such as the Central Valley, which offers more available and cheaper land and reliable transportation infrastructure along Interstate 5, Highway 99, and major rail lines like BNSF. Furthermore, by establishing standards for warehouse construction, siting, and truck routes that protect local communities, the author’s office believes AB 98 addresses the logistics industry’s impacts at both the regional and statewide levels.

On the other hand, AB 98 originally required areas of the state with few or no warehouses—particularly in rural regions—to update their general plan circulation elements. Many local government lobbying groups, such as the California State Association of Counties, the Rural County Representatives of California, and the California League of Cities, view AB 98 as a one-size-fits-all approach to a regional issue, as it would have forced cities and counties in non-warehouse concentrated areas to bear the cost of unnecessary general plan updates before its cleanup legislation. Originally, AB 98 focused its language solely on the IE and urban areas of the state, which created ambiguities that affected rural and agricultural areas.

For example, the original language in AB 98 did not exempt agricultural buildings from warehouse requirements or the roads used in rural regions for truck routes. Many agricultural areas have storage facilities for harvested crops, which differ from “logistic use developments,” as described in AB 98. Agricultural roads also serve these facilities, but the original language only referenced “commercially oriented roadways” (“Bill Text - AB-98 Planning and zoning: logistics use: truck routes,” 2024). Many state advocacy organizations representing other areas of the state had concerns that AB 98 was a blanket statewide mandate and should not apply to all

California regions.

II. Limited Collaboration

Across all stakeholder groups, the prevailing sentiment was that AB 98 was developed with limited collaboration and transparency. As noted above, AB 98 was introduced as a late-gut-amend bill that was entirely amended from a pest management measure into a bill focused on how cities and counties must regulate the logistics industry. These amendments were added on August 28, 2024, during the last week of the legislative session, leaving most stakeholders with limited opportunity to review the bill or propose amendments.

Many interviewed stakeholders described AB 98 as a “deal” with environmental justice groups and state business associations, noting that local governments had little to no input during its development. However, representatives from local IE environmental justice groups reported that they were also excluded from the process. Although Senator Reyes’ office had communicated with them and they were aware she was working on legislation related to the logistics industry, they said they were largely shut out of discussions. Rather than including representatives of local IE environmental justice groups, a special committee or a “workgroup” of statewide stakeholders was convened to provide input on concepts related to AB 98.

Convened by Assembly Member Carrillo, the group included statewide labor representatives, industry groups, local government associations, and public health and environmental advocacy organizations. According to an interviewed member of the workgroup, the group met monthly from spring 2024 through June 2024 to discuss warehouse siting regulations and health protections. However, the workgroup did not draft AB 98 but instead provided input on broad themes. Members of the group still reported being “left in the dark” for months until the bill’s language was finalized just five days before its passage.

Similarly, business interests, such as the IEEP, stated they learned about the bill only a week or less before the end of the session, leaving little time for meaningful contribution or negotiation. Local government lobbying organizations also reported being excluded from the legislative process and unable to propose amendments because of the bill's late introduction. This sentiment was particularly pronounced among IE cities and counties, many of which said they learned about AB 98 only days before its passage or after receiving emails from concerned developers and businesses.

The lack of time for collaboration and stakeholder input was a central source of frustration for all groups. Among interviewed participants, AB 98's rushed process led to poor legislation and subsequent cleanup legislation through Senator Reyes' SB 415 and Assembly Member Carrillo's AB 735 ("Bill Text - AB-735 Planning and zoning: logistics use: truck routes," 2025).

III. Unintended Consequences

Due to AB 98's late gut-and-amend process, the bill contained several ambiguities in its language that ultimately required clarification through SB 415. One issue concerned the two-for-one replacement and relocation assistance for displaced tenants. In AB 98, these provisions could be interpreted as overriding certain state housing rights and tenant protections. For example, some existing housing laws require developers to provide rental assistance to displaced tenants, but AB 98's relocation assistance requirement could be seen as substituting for those payments. Cities might argue that building additional affordable housing satisfies their obligation to comply with AB 98's two-for-one ratio, even if displaced tenants from logistics developments did not receive relocation payments. After housing advocates worked with Senator

Reyes' office, SB 415 addressed these concerns by adding language clarifying that AB 98 supports—rather than overrides—existing housing rights and protections.

Another unintended consequence was the lack of safe harbors for cities and counties to avoid lawsuits and penalties when complying with AB 98. Local government advocacy groups argued that noncompliance cases should be decided in court rather than through enforcement by the Attorney General's Office, which they said creates a dangerous precedent and politicizes cases. While SB 415 retained the Attorney General's authority for enforcement and civil penalties, the clean-up legislation gave the court greater flexibility to determine appropriate penalties and remedies when a city or county fails to comply with the law, including "undue hardship" or "mitigating circumstances" ("Bill Text - SB-415 Planning and zoning: logistics use: truck routes," 2025).

A major amendment included in SB 415, strongly advocated by local government advocacy groups, revised how cities and counties must comply with AB 98's truck route requirements. Rather than requiring a general plan update to comply with AB 98, SB 415 allows cities and counties in non-warehouse concentration regions to adopt ordinances by January 1, 2028, and smaller jurisdictions to adopt ordinances by January 1, 2030. This extension gives cities and counties without many or any warehouses more time to develop truck routes without conducting a full general plan update.

Business interests also raised concerns about long-term economic consequences, which SB 415 did not directly address. With higher construction costs and stricter regulations, businesses may relocate to neighboring states such as Arizona and Nevada. This relocation could increase air pollution in Southern California because the state cannot regulate vehicle emissions from out-of-state trucks, which are often less clean. Longer travel distances to the Ports of Los

Angeles and Long Beach could increase heavy-duty truck emissions and worsen regional air quality. If this becomes a trend, AB 98's public health and environmental goals would be undermined.

In all, while SB 415 resolved many of the ambiguities in AB 98, these clarifications largely resulted from advocacy groups and from collaboration with stakeholders seeking amendments.

IV. Implementation Challenges

Most of the cities and counties interviewed reported implementation challenges related to AB 98. A major challenge was the short timeline given to cities and counties in warehouse-concentrated regions, particularly in the IE, to complete and submit general plan updates that include updated truck routes. One IE city official interviewed noted that their public works department aimed to complete the land use environmental impact report and the circulation element simultaneously within the general plan to streamline the planning process and reduce costs, given the short timeline.

Many cities and counties in the region also have multiple intersecting highways and are located near sensitive receptors, which requires thoughtful truck route planning. For example, Bloomington is bisected by the I-10 freeway and has arterial roads near residential areas. Furthermore, areas like Bloomington already have warehouse facilities sited adjacent to or between sensitive receptors along these roadways, making rerouting trucks away from residential areas difficult. Environmental justice groups also raised concerns that the tight deadline for updates restricts meaningful community engagement during the planning process, especially for these highly impacted communities.

Rerouting trucks within the required timeframe for warehouse-concentrated regions poses additional challenges for local governments, which must hire outside consulting firms to develop new general plans. AB 98 is an unfunded mandate that requires cities and counties in warehouse-concentrated regions to cover the cost of their general plan updates. Interviewed IE officials reported that updating a city or county general plan costs between approximately \$150,000 and \$500,000, depending on staffing and consulting firms. Costs tend to be higher for cities and counties that lack a framework in their general plan or municipal codes for governing warehouse siting and truck routes away from sensitive receptors. While cities and counties with existing long-term planning policies can better absorb these costs, the unfunded mandate still imposes a financial burden. Furthermore, the shorter IE compliance timeline increases costs for local governments, as jurisdictions must allocate additional staff time and consultant fees to meet the deadline. This tight timeline restricts meaningful community engagement and thorough planning by local governments.

Moving forward, enforcing the circulation element remains an implementation challenge. AB 98 and SB 415 require cities and counties to enforce designated truck routes by installing signage at warehouse sites, along streets, and on highways. The California Highway Patrol (CHP) must provide free training for local law enforcement on truck route laws by January 1, 2026, and each city and county must have at least one certified enforcement officer (“Bill Text - SB-415 Planning and zoning: logistics use: truck routes,” 2025). However, several enforcement challenges remain. For instance, if signage is posted but a truck driver uses an incorrect route, it is unclear whether liability would fall on the driver, the company, or the city or county, and what penalties would apply. Also, if only one officer is required to be certified, enforcement of truck

routes is limited when that officer is not on duty, especially in warehouse-concentrated regions like the IE.

V. Local Economy

Another theme raised by many stakeholders was that, at its core, the logistics industry in the IE is fundamentally an economic issue. As the region's largest employer, the IE's economy relies significantly on logistics to provide jobs for thousands of residents and to support the nation's goods movement. For many labor rights groups, AB 98 is a positive step toward diversifying the IE's economy and creating better-paying jobs, as the law places restrictions on new and expanded warehouse developments. The broader goal of economic diversification is also shared by local IE environmental justice groups, which argue that allowing a single, polluting industry to dominate the region should not continue.

In contrast, business associations contend that AB 98 harms the local economy by reducing employment opportunities in the region's largest industry. This concern is amplified by the IE's low higher-education attainment rate, with only about 25 percent holding a bachelor's degree and many heavily dependent on jobs that do not require higher-education credentials (Johnson et al., 2025). Although alternative employment opportunities without bachelor's degrees exist, such as hospitality and retail, these jobs often pay less than the average wage in the logistics industry. These impacts are particularly significant in unincorporated county areas, where warehouse development is frequently sited on infill sites and serves as a major source of employment for residents.

From a local government perspective, warehouses are often used as an important revenue source to support city services and local communities. Cities can approve warehouse projects because they generate steady sales and property tax revenues that help fund essential city

services, such as public safety, infrastructure maintenance, and community programs. This means that a portion of each dollar allocated to warehouse development supports essential city services. However, AB 98 limits the ability of cities and counties to partner with new developers and to fund certain community services, changing how local governments can leverage warehouse development for the public.

At the same time, some interviewed cities reported a decline in logistics project submissions in the year following AB 98's passage. Interviewed city officials do not attribute this decline to AB 98 but to limited land availability and growing "fatigue" with warehouse development. Nonetheless, by imposing stricter restrictions on warehouse expansion, AB 98 may encourage the growth of new industries and create alternative job opportunities in the IE—reshaping an economy dominated by the logistics industry.

Study 3: Early Implementation of AB 98 Results

Prior to AB 98, all cities and counties had some form of truck routes—as required by their general plans—and a basic framework for avoiding residential areas. However, there was still variation in the specificity and strength of measures to avoid sensitive receptors in local truck route plans. AB 98 requires truck routes to maximize the use of interstate or state highways, as well as arterial roads, major thoroughfares, and predominantly commercially oriented local streets when highways are not used.

As shown in Table 3, most jurisdictions maintained truck routes without weight restrictions before AB 98, allowing heavy-duty trucks to use certain roads. Weight restrictions ranged from 6,000 to 14,000 pounds, with 10,000 pounds the most common threshold. San Bernardino County did not have established local truck routes for unincorporated areas before AB 98, except in the Chino Hills community, which designated truck routes without weight

restrictions at 7,000 pounds (“San Bernardino County, California Code of Ordinances,” 2024). Instead, the county’s truck routes consisted of federal and state routes. Additionally, the City of Riverside did not have formal truck route policies or weight restrictions in its General Plan or municipal code, but it prohibited commercial vehicles “exceeding three (3) axles” from using certain streets (“City of Riverside Code of Ordinances,” 2024). These policies are summarized in the second column of Table 3.

Overall, five jurisdictions met AB 98’s deadline for truck route updates: San Bernardino County and the Cities of San Bernardino, Fontana, Jurupa Valley, and Redlands. Most updates were adopted through ordinances or resolutions amending the circulation element of their general plans. For San Bernardino County, this marked the first establishment of truck routes, as only federal and state routes existed before AB 98.

Most jurisdictions that missed the deadline appear to be making progress. Based on official websites and communications with Engineering and Public Works departments, several are actively updating their general plans. For example, Moreno Valley maintains a webpage to solicit community input and share proposed updates. At the December 16, 2025, City Council meeting, the City Council noted the need for “additional time to not only conduct the necessary public outreach, but also to perform the necessary CEQA analysis and schedule and conduct the appropriate public hearings” (“Regular Meeting Agenda,” 2025). The city anticipates the formal adoption of updated truck routes in May 2026 and is in contact with the Attorney General’s office.

Riverside County provided an update at its January 27, 2026, Board of Supervisors meeting on compliance with AB 98. Truck route planning will occur during the “Plot Plan review and Certificate of Occupancy process” (“Board of Supervisors Regular Meeting - Web

Outline,” 2026). Of the seven required elements of AB 98 for truck routes, six will be determined through future plot plans. The City of Riverside has not released public updates on truck routes via its website or council meetings. Rancho Cucamonga adopted compliant truck routes on January 21, 2026, but missed the deadline by 20 days (“Ordinance No. 1054,” 2026). Updated truck routes were provided at this City Council meeting.

Public access to these updates varied. For example, San Bernardino County and the City of Jurupa Valley maintained webpages with updated truck route maps and opportunities for community input (“AB 98: Truck routes in unincorporated San Bernardino County,” 2026). San Bernardino County also held multiple community meetings, including with the Bloomington Municipal Advisory Council, and published draft truck routes online. Jurupa Valley also offered a public survey on its webpage for residents to provide input on where trucks should be placed (“Citywide Truck Route Planning,” n.d.).

In contrast, many jurisdictions limited public access to truck route information, making it available only through Board of Supervisors and City Council meeting materials. While several reported engaging with residents and economic interests, the extent of community outreach is difficult to verify due to limited public documentation. Moreover, excluding San Bernardino County, Jurupa Valley, and Moreno Valley, most publicly available information on truck route development has been limited to board meeting materials.

Enforcement mechanisms for truck routes also vary. In addition to required signage, San Bernardino County established a call line for residents to report trucks using incorrect routes (“AB 98: Truck routes in unincorporated San Bernardino County,” 2026). The City of Fontana delayed enforcement until April 2026, several months after adopting its truck routes in December 2025, citing the need for proper signage and implementation (“City Council Meeting - Master

Case No. 2 (MCN) 25-008,” 2025). The City Council expressed concerns about enforcing beyond signage. The City of San Bernardino Police Department announced that truck routes would be enforced after signage was installed, with a 30-day grace period for compliance in January 2026 (San Bernardino Police Department, 2026).

Table 3. Jurisdictions’ Early Implementation & Accessibility of Information

Jurisdiction	Pre-AB 98 Truck Routes	New Truck Route Policy	Passage Date	Met Deadline?	Accessibility
San Bernardino County	None	Item 136: Establishment of Truck Routes	12/16/25	Yes	AB 98 Webpage; 12/16/25 Board of Supervisors Meeting
Riverside County	Truck routes without weight restrictions (10,000 pounds)	N/A	N/A	No	01/27/26 Board of Supervisors Meeting Update
City of San Bernardino	Truck route restrictions (14,000 pounds)	Ordinance No. 1657	12/17/25	Yes	12/17/25 City Council Meeting
City of Riverside	Truck route restrictions	N/A	N/A	No	None
City of Moreno Valley	Truck routes without weight restrictions (6,000 pounds)	N/A	N/A	No	AB 98 Webpage; 12/16/25 City Council Meeting Update
City of Fontana	Truck routes without weight restrictions	Ordinance No. 1978	12/09/25	Yes	12/09/25 City Council Meeting

	(10,000 pounds)				
City of Jurupa Valley	Truck routes without weight restrictions (10,000 pounds)	General Plan Amendment No. 25011	12/04/25	Yes	AB 98 Webpage; 12/04/25 City Council Meeting
City of Rancho Cucamonga	Truck routes without weight restrictions (6,000 pounds)	Ordinance No. 1054	01/21/26	No	01/21/26 City Council Meeting
City of Redlands	Truck routes without weight restrictions (10,000 pounds)	Resolution No. 8739	12/16/25	Yes	12/26/25 City Council Meeting
City of Perris	Truck routes without weight restrictions (10,000 pounds)	N/A	N/A	No	Draft on “Environmental Documents for Public Review” Webpage

DISCUSSION

To assess the importance of treating the logistics industry as a regional issue, this study first examined IE county and city municipal codes before AB 98. The analysis evaluated the stringency and consistency of local regulations governing the logistics industry before AB 98’s passage, comparing them with the standards later established under the law. The findings reveal considerable variation across jurisdictions in key regulatory areas, including warehouse setback distances, buffer zones, and anti-idling requirements. In most jurisdictions, local standards fell

below the minimum requirements later established by AB 98, underscoring regulatory inconsistencies and justifying the need for state-level intervention in the governance of the logistics industry in the IE.

Building on this analysis, my study then aimed to evaluate how the state legislature can effectively regulate the logistics industry in a manner that is both comprehensive and implementable at the local level in the IE. Through interviews with local and state stakeholders, I focused on examining the strengths and weaknesses of AB 98. Findings from these interviews reveal five main themes: (1) the benefits and disadvantages of AB 98's statewide mandate; (2) limited collaboration during AB 98's legislative process; (3) implementation challenges faced by IE local governments; (4) unintended consequences resulting from AB 98's late gut-and-amend process; and (5) broader implications for the future of the IE's local economy.

The final phase of data collection tracked the early implementation of AB 98 across IE jurisdictions, focusing on whether local governments met AB 98's January 1, 2026, deadline for updated truck routes and on the transparency of the process. Approximately half of the IE jurisdictions studied met the deadline, while the remainder are still developing their truck routes. This result aligns with what local IE government officials shared in interviews, namely that they would struggle to meet the shorter deadline. However, many local governments that formally adopted new routes indicated in their Board of Supervisors and City Council meetings that they plan to make revisions. This suggests that although some jurisdictions adopted new routes by the deadline, this may have been primarily to avoid penalties from the Attorney General rather than to implement fully finalized route plans.

Accessibility and transparency in community outreach also varied among local governments. Some jurisdictions held community meetings, conducted surveys, hosted public

hearings, or issued news releases with updates. However, most presented updated truck routes only during City Council meetings with public comment. Local governments may have been under pressure to meet AB 98's deadline and were unable to conduct robust outreach. Notably, a few jurisdictions that missed the deadline cited insufficient time for outreach as a reason for requesting more time from the Attorney General's office. This implementation challenge points to ambiguity in AB 98's language, which does not clearly define expectations for community engagement. It also supports concerns raised by environmental justice groups that local governments would rush the process and not conduct full outreach to meet AB 98. Given that half of the jurisdictions failed to meet the deadline and most did not conduct comprehensive community outreach, AB 98 should have allowed warehouse-concentrated regions a longer timeline and more clearly specified community engagement guidelines.

Looking ahead, enforcing designated truck routes presents several challenges. Most jurisdictions rely primarily on signage and CHP patrols. However, there are concerns about the consistency of enforcement and compliance. For example, San Bernardino County has established a call line for residents to report issues to the police department, while many other jurisdictions have not outlined similar systems for their truck routes ("AB 98: Truck routes in unincorporated San Bernardino County," 2026). Expanding reporting mechanisms, including contact information on roadway signage, could help enforcement by making it easier for residents to file complaints. In addition, questions remain about liability and penalties when drivers deviate from designated routes. These penalties may vary based on the type of violation (e.g., wrong route or idling for more than three-minutes), but this should also have been specified in AB 98.

Overall, AB 98 is a first-of-its-kind bill to regulate the logistics industry at the state level. The data collected in this study support the need for state intervention, as standards before AB 98 for warehouses and their proximity to sensitive receptors were low and inconsistent across jurisdictions. Although AB 98's standards are less stringent than those recommended by environmental and public health organizations, they are stronger than previous local regulations. Furthermore, the bill's late gut-and-amend process reflects the political reality of passing a bill regulating the logistics industry in Sacramento. Given Senator Reyes' previous efforts and her representation of some of the most impacted communities of the logistics industry, the sense of urgency to impose regulatory restrictions on local governments is understandable.

However, to create a more collaborative process, the state should prioritize areas of consensus among stakeholders for future public policy. Based on this study's interviews, all stakeholders agreed that transitioning to clean energy and electric vehicles (EVs) is one of the most effective ways to address the logistics industry's environmental and public health effects. This is because clean energy and EV technologies benefit all stakeholders. For example, environmental justice groups support policies like the Advanced Truck Rule, which seeks to accelerate the transition to EVs by requiring manufacturers to sell an increasing number of zero-emission vehicles from 2024 to 2035 ("Advanced Clean Trucks," 2026). Business stakeholders emphasized that the source of pollution is trucks—not warehouses—and that clean energy can address that issue. Labor groups recognize that EV-related industries can generate higher-paying, unionizable jobs, such as electrical work, vehicle manufacturing, engineering, and automotive and repair maintenance (Allen et al., 2025).

Finally, local governments often said they view air quality regulation as outside their primary jurisdiction and that this responsibility falls to regional air quality management districts,

such as the South Coast Air Quality Management District, and to the logistics industry itself. This further underscores the need for state-level leadership. The state can take steps such as expanding the electrical grid, investing in EV charging infrastructure, transitioning to zero-emission fleet trucks, enhancing railway systems, and implementing more green building standards for warehouses to mitigate the industry’s environmental and public health impacts.

In the long term, however, this issue is fundamentally economic, as the IE’s dependence on the logistics industry has become too deep. Like other regions in California, such as Silicon Valley in the San Francisco Bay Area and Los Angeles’ entertainment industry, the IE’s economic driver is its strength in manufacturing and construction—making it an attractive place for companies seeking logistics operations. However, technological advancements, including automation and artificial intelligence, must be accounted for in policy decisions moving forward (Neelakandan, 2026; Dyczkowska et al., 2025). These tools have the potential to benefit the region by creating higher-skilled, better-paying jobs in sectors such as engineering, operations management, and advanced manufacturing. But current lower levels of higher education attainment in the region mean that the IE lacks the large skilled workforce to fill these positions (Johnson et al., 2025). This gap emphasizes the need for significant investment in education and workforce development.

Expanding access to K-12 and higher education programs is critical to educating and retaining future high-skilled workers. Establishing programs such as Growing Inland Achievement and extending outreach from local universities are essential to making higher education accessible to students in the IE (“Growing Inland Achievement,” 2026). Employer-led training programs can also help current workers transition into more technical, higher-paying positions by equipping them with the skills to operate and manage emerging technologies.

Without such investments, these jobs will likely be filled by workers from outside the region, or companies will relocate altogether. While diversifying the job market is important, the logistics industry is not going to disappear and will continue to play a central part of the IE's economy. Therefore, regional leaders must seize the opportunity to prepare the IE's workforce for higher-skilled jobs.

This study has limitations. Because many general plan updates were not submitted until after May 2026, missing data prevented a full evaluation of AB 98's implementation and effectiveness. Future research should compare pre-AB 98 and post-AB 98 truck routes to assess impacts on sensitive receptors. Additionally, inconsistencies in how municipalities organize logistics-related policies within their codes and general plans—as well as outdated or “dead” language following AB 98's passage—may have introduced discrepancies in the analysis. Therefore, future research should corroborate the findings of this analysis to confirm accuracy.

Ultimately, this study provides a foundation for future research examining state policies to address the IE's logistics industry and should be expanded through continued scholarly research.

REFERENCES

AB 98: Truck routes in unincorporated San Bernardino County. (2026). *San Bernardino County Land Use Services*. <https://lus.sbcounty.gov/truckroutes/>

Advanced Clean Trucks. (2026). *California Air Resources Board*.
<https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>

Allen, K., et al. (2025). Taking the High Road in the EV Logistics Transition: Workforce Development Strategies for the Inland Empire and Beyond. *Inland Empire Labor and Community Center, University of California Riverside*.
<https://ielcc.ucr.edu/research/taking-high-road-ev-logistics-transition-workforce-development-strategies-inland-empire-and-beyond>

Attorney General Bonta Challenges Approval of Warehouse Project in South Fontana Neighborhood Already Overburdened by Unhealthy Air Pollution. (2021, July 23). *Office of the Attorney General*.
<https://oag.ca.gov/news/press-releases/attorney-general-bonta-challenges-approval-warehouse-project-south-fontana>

Bill Text - AB-1000 Qualifying logistics use projects. (2023). *California Legislative Information*.
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240AB1000

Bill Text - AB-1547 Air pollution: warehouse facilities. (2021). *California Legislative Information*.
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB1547

Bill Text - AB-1748 Logistics use projects: sensitive receptors. (2023). *California Legislative Information*.
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB1748

Bill Text - AB-735 Planning and zoning: logistics use: truck routes. (2025). *California Legislative Information*.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB735

Bill Text - AB-98 Planning and zoning: logistics use: truck routes. (2024). *California Legislative Information*.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB98

Bill Text - SB-415 Planning and zoning: logistics use: truck routes. (2025). *California Legislative Information*.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB415

Board of Supervisors Regular Meeting - Web Outline. (2026, January 27). *Riverside County Meeting Portal*.

https://riversidecountyca.iqm2.com/Citizens/Detail_Meeting.aspx?ID=3353

Bond, V. P. (2022, December 22). Pandemic Left Behind, the Inland Empire Economy Flourished in 2022. *UCR News*,
news.ucr.edu/articles/2022/12/21/pandemic-left-behind-inland-empire-economy-flourished-2022.

Brennan, D. (2024, September 5). Job killer or neighborhood protector? Proposed warehouse rules divide Inland Empire. *LAist*.
<https://laist.com/news/climate-environment/job-killer-or-neighborhood-protector-proposed-warehouse-rules-divide-inland-empire>

City Council Meeting - Master Case No. 2 (MCN) 25-008. (2025, December 9). *City of Fontana, California*.

<https://fontana.legistar.com/LegislationDetail.aspx?ID=7768099&GUID=9D2ABB17-C2D6-47EC-B8B6-08B584C97F9E&Options=&Search=>

City of Moreno Valley Code of Ordinances. (2025). *eCode*. <https://ecode360.com/43228958>

City of Rancho Cucamonga, CA Code of Ordinances. (2026). *eCode*.
<https://ecode360.com/RA4992>

City of Riverside Code of Ordinances. (2024). *MuniCode Library*.
https://library.municode.com/ca/riverside/codes/code_of_ordinances/459385

Citywide Truck Route Planning. (n.d.). *City of Jurupa Valley, California*.
<https://www.jurupavalley.org/607/Citywide-Truck-Route-Planning>

Dyczkowska, J. A., Olkiewicz, M., & Królikowski, T. (2025). The use of artificial intelligence in logistics information systems. *Procedia Computer Science*, 270, 5198–5206.
<https://doi.org/10.1016/j.procs.2025.09.647>

Fontana Municode Codification. (2024). *MuniCode Library*.
https://library.municode.com/ca/fontana/codes/zoning_and_development_code?nodeId=CH30ZODECO_ARTVIIIINZODI_DIV1GE_S30-522INDI

Growing Inland Achievement. (2026). *Inland Empire GIA*. <https://inlandempiregia.org/>

Hussain, S. (2022, October 15). Amazon workers in San Bernardino allege anti-union actions and retaliation. *Los Angeles Times*.
<https://www.latimes.com/business/story/2022-10-15/amazon-workers-at-san-bernardino-air-freight-facility-protest-alleged-retaliation>

Inland empire once again ranks as worst in nation for air quality. (2022, May 2). *PBS SoCal*.
<https://www.pbssocal.org/shows/earth-focus/inland-empire-once-again-ranks-as-worst-in->

nation-for-air-quality#:~:text=Once%20again%20San%20Bernardino%20and,nationally
%2C%20according%20to%20the%20report

Johnson, H., et al. (2025, May). Pathways to College Completion in the Inland Empire. *Public Policy Institute of California*.

<https://www.ppic.org/publication/pathways-to-college-completion-in-the-inland-empire/>

Jurupa Valley, California - Municipal Code. (2024). *MuniCode Library*.

https://library.municode.com/ca/jurupa_valley/codes/municipal_code?nodeId=TIT9PLZO_CH9.240GEPR_S9.240.470MIRE

Moenius, J. (Host). (2024, January 19). Warehousing and Quality of Jobs in the Inland Empire. *In Policy Chats*. UCR School of Public Policy.

<https://spp.ucr.edu/warehousing-and-quality-jobs-inland-empire>

Neelakandan, L. (2026, February 13). How packaging and logistics companies are automating their warehouses. *CNBC*.

<https://www.cnbc.com/2026/02/13/shipping-autotmation-logistics-labor.html>

Ordinance No. 1054. (2026, January 27). *City of Rancho Cucamonga*.

<https://rcdocs.cityofrc.us/WebLink/DocView.aspx?id=2060300&dbid=0&repo=RanchoCucamonga&cr=1>

Perris, California - Code of Ordinances. (2025). *MuniCode Library*.

https://library.municode.com/ca/perris/codes/code_of_ordinances

Phillips, S. A. (2022, May 1). Op-Ed: We mapped the warehouse takeover of the Inland Empire. The results are overwhelming. *Los Angeles Times*.

<https://www.latimes.com/opinion/story/2022-05-01/inland-empire-warehouse-growth-map-environment>

Plevin, R. (2024, September 25). Judge halts construction of massive warehouse project after scores of homes demolished. *Los Angeles Times*.

<https://www.latimes.com/california/story/2024-09-25/judge-halts-construction-of-massive-warehouse-project-after-scores-of-homes-demolished>

Pope, C. A. (2000). Epidemiology of fine particulate Air pollution and Human Health: biologic mechanisms and who's at risk? *Environmental Health Perspectives*, 108, 713.

<https://doi.org/10.2307/3454408>

Redlands, CA Code of Ordinances. (2026). *eCode & American Legal Publishing*.

https://codelibrary.amlegal.com/codes/redlandscalatest/redlands_ca/0-0-0-1

Regular Meeting Agenda. (2025, December 16). *City of Moreno Valley*.

<https://pub-morenovalley.escribemeetings.com/FileStream.ashx?DocumentId=5771>

Riverside County, California - Code of Ordinances. (2024). *MuniCode Library*.

https://library.municode.com/ca/riverside_county/codes/code_of_ordinances?nodeId=TIT10VETR

San Bernardino County, California Code of Ordinances. (2024). *eCode & American Legal Publishing*.

https://codelibrary.amlegal.com/codes/sanbernardino/latest/sanberncty_ca/0-0-0-146479

San Bernardino Police Department. (2026, January 5). IMPORTANT INFORMATION

[exclamation mark emojis] The City of San Bernardino has designated commercial truck routes; these will take effect starting January 1, 2026... [Image attached] [Facebook post]. Facebook.

<https://www.facebook.com/SanBernardinoPD/posts/important-information%EF%B8%8F>

%EF%B8%8F%EF%B8%8Fthe-city-of-san-bernardino-has-designated-commercial-tru/1
326490486170700/

State of Work in the Inland Empire Part II Pandemic, Polarization, Inflation, & Investment.

(2023). *Inland Empire Labor and Community Center, University of California Riverside.*

<https://ielcc.ucr.edu/document/state-workers-ie-2025-report>

The Value of Trade through the Port of Long Beach. (2025, June 6). *Port of Long Beach.*

<https://polb.com/port-info/news-and-press/the-value-of-trade-through-the-port-of-long-beach-06-06-2025/>

Whitehead, B. (2022, July 9). Colton school district swaps elementary school land in \$45 million deal with warehouse developer. *San Bernardino Sun.*

<https://www.sbsun.com/2022/07/08/colton-school-district-swaps-elementary-school-land-in-45-million-deal-with-warehouse-developer/>

APPENDIX A

Study 1: Local Regulations Before AB 98

The following table summarizes pre-AB 98 regulations in local IE jurisdictions' code of ordinances. Some of the language is drawn from the most recent version of municipal codes because it was the only version publicly available. However, this was still appropriate as the jurisdictions have “dead” language with policies that have not been updated to incorporate AB 98's requirements.

Table A

City/County	Setback Distances	Buffers	Truck Routes Avoiding Sensitive Receptors	Anti-idling & Signage	Link to ORD
San Bernardino County	General zoning setbacks between different land uses (≥ 15 ft or district requirement); varies by zone and includes different distances for front, side, and rear yard setbacks	10 ft landscaping + 6 ft masonry wall between industrial and residential uses, not specifically logistics developments	Truck routes designated by Board; applies to vehicles $> 7,000$ lbs	5-minute idling limit; signage required (exceptions for queuing)	https://codeofcity.org/city-ca/0-0-0-168074
Riverside County	20–25 ft from residential zones (mini-warehouse use context)	6-ft wall + berm/landscaping (effective 8 ft screen and mini-warehouse use context)	No parking of large trucks ($> 10,000$ lbs) in residential areas	No specific idling rule listed	https://library.municode.com/ca/riverside_county/codes/code_of_ordinances?nodeId=TIT10VETR

City of San Bernardino	No specific standards	No specific standards	Truck restrictions on streets >14,000 lbs in residential areas	No specific standards	https://codelibrary.amlegal.com/codes/sanbernardino/latest/sanberncty_ca/0-0-0-168051
City of Riverside	Orient loading/truck areas away from sensitive receptors (no fixed distance)	Full screening required; 8-ft wall if adjacent to residential	Strive to minimize truck traffic in residential areas; restrict large trucks on certain streets	5-minute idling limit; require electric hookups for refrigerated trucks	https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT19ZO_ARTVIISPLAUSPR_CH19.435WADIFA_19.435.030SIL_OOPDEST
City of Moreno Valley	250 ft separation (for >50k sq ft); setbacks vary; min 20 ft building setback	6-ft walls + landscaping; buffering required for noise, dust, etc.	Designated truck routes (no specific mention of sensitive receptors)	5-minute idling limit near residential areas	https://ecode360.com/43228958
City of Fontana	Docks ≥300 ft from sensitive receptors (for >400k sq ft); no abutting receptors	10–20 ft landscaped buffer + 10-ft wall (depending on size)	Required truck routing plan; enforce no queuing/parking	3-minute idling limit; signage required	https://library.municode.com/ca/fontana/codes/zoning_and_development_code?nodeId=CH30ZODECO_ARTVIIIINZODI_DIV1GES30-522INDI
City of Jurupa Valley	50 ft setback when industrial	8-ft wall + landscaping; specific to	Designated truck routes; trucks	5-minute idling limit	https://library.municode.com/ca/jurupa_

	building is abutting residential/commercial	storage space, not logistics developments	>10,000 lbs restricted to routes		valley/codes/municipal_code?nodeId=TI9PLZO_CH9.240GEPR_S9.240.470MIRE
City of Rancho Cucamonga	45 ft setback when adjacent to residential or Interstate 15; if logistics exceeds 35 ft. in height, then setback increases one ft per extra ft of height	6-ft wall between residential and industrial + landscaping strip (min 5 ft)	Designated truck routes for vehicles over 3 tons	Requires electric truck hookups (no explicit time limit)	https://ecode360.com/RA4992
City of Redlands	No numeric setback; warehouses must be within 1 mile (5,280 ft) of a freeway ramp to Interstate 10 or Interstate 210	10-ft minimum when adjacent to sensitive receptors	Trucks over 5 tons must use designated truck routes with some exceptions	5-minute idling limit for diesel trucks; signage required	https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-32577
City of Perris	Front and street-side yard setbacks increase by 10 ft for each 10 ft of building height over 30 ft	Must be fully screened; requires a minimum 3-ft buffer with varied-height plantings	Trucks over 5 tons must use designated truck routes only	5-minute idling limit for diesel trucks; requires electric hookups for refrigerated containers	https://library.municode.com/ca/perris/codes/code_of_ordinances

APPENDIX B

Study 2: Questions Submitted to the Institutional Review Board

The following are questions that were approved by the Institutional Review Board (IRB) during spring 2025. Some questions were subsequently revised to include updates about AB 98's clean-up legislation, insights from interview conversations, and findings gathered throughout the research process.

State Legislative Officials:

1. What specific environmental and public health issues does AB 98 aim to address?
2. What are the strengths and weaknesses of AB 98?
3. What are some consequences that AB 98 has had on economic growth and protecting local communities in the Inland Empire?
4. What are the anticipated benefits for communities located near warehousing developments as a result of AB 98's implementation?
5. With many of the “warehouse concentration regions”—including the City of San Bernardino, Fontana, Redlands, and Rancho Cucamonga—in the Inland Empire, how did this influence the proposal AB 98?
6. In July 2021, the California Department of Justice filed a lawsuit against the City of Fontana challenging its approval of a new warehouse development due to a limited environmental review that violated CEQA. In April 2022, however, the California Department of Justice announced a settlement with the City of Fontana, the warehousing company, and other litigants. Do you believe that cities are making responsible decisions about warehousing developments?

7. Critics of A.B. 98 argue that the bill sets a “harmful precedent” with its circulation element and buffer zone requirements, which may slow economic development in California and have high implementation costs for local city governments.
 - Do you think that AB 98 sets stringent enough standards to protect public health in affected communities, particularly in the Inland Empire?
 - Can AB 98 successfully balance economic development with environmental protection?
 - While the bill’s cost to local governments is unknown, cities may have to spend between \$100,000 and millions of dollars to implement the General Plan or pay the California Attorney General’s penalty of \$50,000 for delays. How can AB 98 address cities’ fiscal concerns?
8. Why was AB 98 introduced in the final week of the 2024 legislative session?
9. What should future public policy look like to effectively address the logistics industry and its impacts?

Environmental Groups:

1. Does your organization support or oppose AB 98 and what are the reasons for your stance on the bill?
2. What are the strengths and weaknesses of AB 98?
3. How is AB 98 impacting the protection of public health in local communities?
4. One concern raised about AB 98 is that the bill sets a “harmful precedent” with General Plan requirements, including updating buffer zones and trucking routes, from sensitive receptors. What types of regulations do you think would be stringent enough to protect the well-being and health of local community members?

5. Another concern about AB 98 is the limited time organizations and stakeholders were given to provide sufficient feedback or amendments to the bill. What amendments or changes, if any, would you have made to AB 98?
6. As a nonprofit organization focused on advocating for environmental justice, what concerns have community members expressed about AB 98 or the logistics industry?
7. What should future public policy look like to effectively address the logistics industry and its impacts?

City Officials:

1. Does your organization support or oppose AB 98 and what are the reasons for your stance on the bill?
2. What are the strengths and weaknesses of AB 98?
3. How is AB 98 affecting the local economy in cities?
4. One concern raised about AB 98 is the “circulation element,” which requires cities and counties to update truck routes. While the bill’s cost to local governments is unknown, cities may have to spend between \$100,000 and millions of dollars to implement the General Plan or pay the California Attorney General’s penalty of \$50,000 for delays.
 - What are the costs looking like now for city governments to implement AB 98?
 - Should AB 98 include a provision to help cities manage this financial burden? If so, what should those provisions include?
5. Another concern about AB 98 is that it strips local governments of land use authority. What are the potential consequences of this authority away from cities?
6. As the logistics industry grows throughout California, especially in the Inland Empire, is it possible to address environmental concerns as a regional issue? In other words, is it

feasible to address these challenges if cities have different zoning laws and requirements for warehouse developments?

7. Another concern about AB 98 is the limited time organizations and stakeholders were given to provide sufficient feedback or amendments to the bill. What amendments or changes, if any, would you have made to AB 98?
8. What should future public policy look like to effectively address the logistics industry and its impacts?

Labor Organizations:

1. Does your organization support or oppose AB 98 and what are the reasons for your stance on the bill?
2. What are the strengths and weaknesses of AB 98?
3. What are some common challenges workers experience in warehouses?
4. One concern raised about AB 98 is that larger buffer zones and new truck route requirements will limit the availability of land for new or expanded warehouses. How will this affect California and the Inland Empire's economic growth and job opportunities?
5. If expanding or building new warehouses becomes more difficult, could this create opportunities for new types of businesses to emerge in California and the Inland Empire?
6. What would you recommend as a solution to ensure "quality of life and well-being" for local communities in California, particularly the Inland Empire?
7. One concern about AB 98 is the limited time organizations and stakeholders were given to provide sufficient feedback or amendments to the bill. What amendments or changes, if any, would you have made to AB 98?

8. What should future public policy look like to effectively address the logistics industry and its impacts?

Business Associations:

1. Does your organization support or oppose AB 98 and what are the reasons for your stance on the bill?
2. What are the strengths and weaknesses of AB 98?
3. How is AB 98 affecting logistics developers and business entities operating in California and the Inland Empire?
4. One concern raised about AB 98 is that larger buffer zones and new truck route requirements will limit the availability of land for new or expanded warehouses. How may this impact economic growth in the state?
5. Is there a way to continue developing logistic industries in California and protect local communities' health?
6. With over 4,000 warehouses in the Inland Empire, critical to distributing the nation's e-commerce goods and services, how will AB 98 affect national trade for businesses and consumers?
7. If it becomes more difficult to expand or build new warehouse developments in California, is it likely that businesses will move out of state? If so, how will this put the state at an economic disadvantage?
8. One concern about AB 98 is the limited time organizations and stakeholders were given to provide sufficient feedback or amendments to the bill. What amendments or changes, if any, would you have made to AB 98?

9. What should future public policy look like to effectively address the logistics industry and its impacts?

APPENDIX C

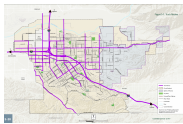
Study 3: Early Implementation of AB 98 Table:

The table below tracks the progress of local IE jurisdictions' progress in updating truck routes by AB 98's January 1, 2026, deadline. It includes maps of the jurisdictions' pre-AB 98 truck routes, post-AB 98 truck routes (if approved), drafts of proposed truck routes (if not yet approved), and the sources where all this information was obtained. If available, maps of truck routes and public meetings are hyperlinked. The table also includes pictures of the truck route maps from City Council or Board of Supervisors meetings where updates about truck routes were provided.

Table C

Jurisdiction	Pre-AB 98 Truck Routes	Source	Post-AB 98 Truck Routes (Approved or not approved)	Met deadline?	Source
San Bernardino County	No local truck routes before AB 98; only includes federal and state truck routes	General Plan (County Policy Plan October 2020)	Post-AB 98 GIS Map Approved; still being updated throughout 2026	Yes	01/16/2025 Board of Supervisors Meeting
Riverside County	No local truck routes before AB 98; only includes federal and	General Plan	No map; have not approved and no drafts are publicly available	No	Update on AB 98: 01/27/2026 Board of Supervisors Meeting

	state truck routes				
City of San Bernardino	Pre-AB 98 Truck Route Restrictions Map	City of San Bernardino Traffic Webpage	Post-AB 98 Truck Routes Approved: 10.24.195 CITYWIDE TRUCK ROUTES	Yes	Ordinance No. 1657
City of Riverside	No maps of truck routes are publicly available	N/A	No map; have not approved and no drafts are publicly available	No	N/A
City of Moreno Valley	Pre-AB 98 Truck Route Map	AB 98 / SB 415 Truck Routes in Moreno Valley	Proposed Post-AB 98 Truck Route Map Not approved; likely May 2026	No	12/16/25 City Council Meeting
City of Fontana	Pre-AB 98 Truck Routes	General Plan “Community Mobility and Circulation” Adopted 2023	 Post-AB 98 Truck Route Map from 12/09/25 City Council Meeting	Yes	12/09/25 City Council Meeting Ordinance No. 1978 (Enforcement doesn't happen until April 2026)
City of Jurupa Valley	No maps of truck routes are publicly	Citywide Truck Planning		Yes	12/4/25 City Council Meeting

	available	Webpage	Post-AB 98 Truck Route Map from 12/04/25 City Council Meeting		
City of Rancho Cucamonga	Pre-AB 98 Truck Route Map 	General Plan “Community Mobility” May 2020	Approved Ordinance No. 1054	No	Approved 01/21/26 with Ordinance No. 1054
City of Redlands	Pre-AB 98 Truck Route Map 	General Plan: “Chapter 5: Connected City”	Approved with Resolution No. 8739 Post-AB 98 Truck Route Map	Yes (Approved 12/16/25)	12/26/25 City Council Meeting
City of Perris	Pre-AB 98 Truck Routes	City Council Approved 07/26/22	Not approved Post-AB 98 Truck Route Draft	No	Draft on “Environmental Documents for Public Review” Webpage