



SENT VIA EMAIL
June 15, 2026

Planning Commission
Michael Hitz, Principal Planner
City Clerk
Email: planning@cityofchino.org; cityclerk@cityofchino.org; mhitz@cityofchino.org

RE: Comment Letter on proposed Chino Truck Routes as included in 2045 General Plan – Item 5

Dear Planning Commission, City Staff, City Clerk

The Sierra Club Los Serranos Group and Freight Communities Action Coalition would like to thank you for the opportunity to comment on the Assembly Bill 98/Senate Bill 415 revisions to Chino Truck Routes as described in the General Plan 2045 update in Map INF-3 and Map INF-4. We support the removal of the following truck routes that do not meet the intent or plain language requirements of Assembly Bill 98 to minimize exposure of sensitive receptors (people) to truck routes by prioritizing the use of freeways and divided highways for trucks. The following routes are unnecessary to access industrial/commercial/agricultural zones and unnecessarily create truck bypasses from industrial zones through residential neighborhoods.

- Riverside Drive; all
- Central Ave; north of SR-60
- Ramona Ave; north of Schaeffer Ave
- Edison Ave; east of Oaks Ave
- Pine Ave; East of Euclid Ave
- Hellman Ave; south of Kimball Ave
- East End Ave; south of Placentia Ct.

Each of these truck routes is unnecessary and in direct conflict with the plain text of AB 98 and SB 415 as they are predominantly residential areas (i.e., sensitive receptors) and are not the most direct access to industrial zones from freeways and divided highways. We respectfully request that City Staff and the Planning Commission additionally remove the following truck routes, as depicted in **Figure 1**. Our proposed map allows shortest-line direct access for trucks to all predominant industrial/agricultural/commercial zones and minimizes exposure to residents by removing the bypasses and unnecessary routes.



Industrial/Agriculture zones



Truck Routes to remove

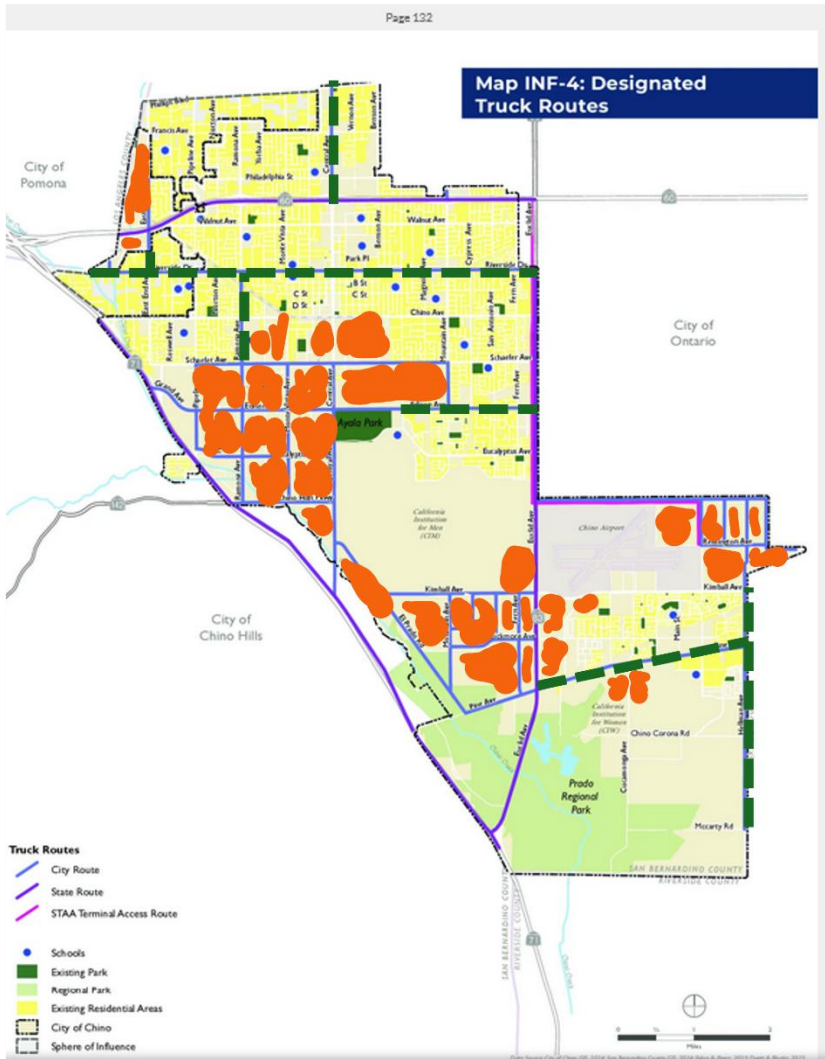


Figure 1. Proposed truck routes to remove (dark green dashes), along with existing industrial/agricultural zones (orange) in Chino.

The Sierra Club Los Serrano Group is part of a coalition of community groups in western Riverside County that won a \$250,000 grant from the State Air Resources Board to discuss the implementation of truck routes in the municipalities of Western Riverside County and hosted an AB 98 Truck Route summit in Mead Valley on November 7th, 2025 and a follow-up meeting on February 21, 2026. Multiple municipalities sent representatives, including the cities of Perris, Moreno Valley, and Riverside, and the Counties of Riverside and San Bernardino. We discussed truck route planning throughout the region and hope our local expertise can help the City of Chino to better meet the legal standards for truck route planning described in AB 98 and SB 415.

Our coalition supports the establishment of truck routes that narrowly meet the established guidelines of the statewide truck route ordinance. Here’s a plain language summary of the key text.

- Establish truck routes to safely accommodate additional truck traffic and avoid residential areas and sensitive receptors §65098.2.8(a)(1)
- Maximize highways as preferred routes for truck routes. Use major roadways when state or interstate highways are not utilized. §65098.2.8(a)(2)

- Use local roads only when strictly necessary to reach existing industrial zones. §65098.2.8(a)(2)(A)
 - Trucks shall be routed via transportation arteries that minimize exposure to sensitive receptors. §65098.2.8(a)(2)(B)
 - Restrict logistics development use to truck route roadways. §65098.2.8(a)(2)(C)(i)
 - Local roads should be truck routes only if at least half of properties fronting the road within 1,000 feet are commercial, agricultural, or industrial zoning. §65098.2.8(a)(2)(C)(ii)
- The city shall 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 that the planning agency deems appropriate, consistent with Section 65351. The city shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the changes required pursuant to this section. §65098.2.8(f, g)

We believe that our proposed changes are consistent with the intent and plain text of AB 98 and SB 415 and hope that City planning commission and staff takes these proposed changes seriously. Please include us on any future notifications on this project that involve updates to the proposed truck routes. Also, attached please find a flyer with some guidance for community-led truck route planning.

Sincerely,

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Community Guidance on Truck Route Planning

Guiding Principles

Truck route planning should:

- *Prioritize Community Engagement:* Engage community groups (neighborhood associations, residents, environmental groups, tribes, school districts, and other stakeholders) through all stages of the planning and implementation process.
- *Maximize Use of Highways:* Prioritize and maximize the use of dedicated interstate and state highway infrastructure for all truck traffic.
- *Minimize Impacts on Sensitive Receptors:* Strictly avoid routes through residential neighborhoods, near schools, day care centers, hospitals, nursing homes, parks, playgrounds, and established bike routes.
- *Minimize truck routes within communities:* Only provide local routes as needed to access essential industrial zones.
- *Establish Zero-Emission Zones:* designate 'Green Zones' - where entry is restricted exclusively to zero-emissions commercial vehicles

These principles were synthesized after the AB 98 Truck Route Summit held in Mead Valley on November 7, 2025

Negative Impacts of Truck Routes

Truck traffic on local streets generates significant impacts

- Increases traffic accidents, safety hazards, maintenance costs, road deterioration, congestion, pollution, and noise.
- Disproportionately harms vulnerable populations and undermines efforts to achieve healthy communities.
- Promotes additional industrial development along truck routes, such as fueling stations and truck terminals
- Conflicts with active transportation modes of walking and biking
- Slows emergency response times



More
Information



Overview

On November 7, 2025, the Freight Communities Action Coalition hosted the AB98 Truck Route Summit, gathering attendees from local municipalities, elected officials, local agencies, labor organizations, grassroots and community organizations, and community members. Over sixty participants engaged in discussions on community principles and truck route details. This Summit is part of a community-led effort to address AB 98 requirements, which require elected officials to engage community members at every stage of the planning process. The previous sections are key takeaways from our time together.

Coalition Partners



Contact Us



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<https://sites.google.com/ccaiej.org/freightcommunitiesac>

Objection letter from Mr. Robert Nigg

Objections to PL24-0146 (Zoning Ordinance Amendment) and PL25- 0108 (Zone Change) to be Heard before the Planning Commission on June 17, 2026

Opening Statement

A project such as the Eden development should never have been allowed to be approved by our city. The citizens of Chino do not want the loss of our small town atmosphere. We do not want four story buildings in our residential neighborhoods. We do not want the loss of our scenic views. We do not want housing density of over 50 units per acre. We do not want the excess traffic caused by the clustering of high density developments in certain neighborhoods. We do not want the lack of parking on our public streets and neighborhoods.

On November 19, 2024 during the City Council meeting relating to the motion to adopt the Amendment of the 2021-2029 Housing Element Update and Introduction of Ordinance No 2024-003 (ZOA PL23-0133) a request was made for the council to conduct a call for review. Objections the Housing Element had been made at this meeting concerning the new zoning standards for the overlay districts. Per the meeting minutes, the motion was revised by the city council to include the addition of staff review for revisions to height, density and storage facilities related to the Housing Element for affordable housing sites.

The newly proposed zoning ordinance amendments are not the answer to these problems, rather as it is drafted, it will only make the problems worst. The proposed amendments are just another failed and mismanaged attempt that will further allow developers to control our once proud city.

It is recognized that the state has created unrealistic laws involving affordable housing mandates. There are also recent court cases that have created havoc to the ability of local cities to enforce their zoning standards. As example, the court case "Bankers Hill 150" has allowed unlimited waivers to development standards be given to developers that circumvent our local zoning standards. Another case, "Redondo Beach" have outlawed local standards for mixed use overlays in affordable housing sites.

While the state and courts have created very complex laws and regulations, there are still intelligent solutions that can be used by our city officials to help protect our neighborhoods. Our city leaders are not doing enough to protect our city and need to rewrite and fix the proposed amendments to this zoning code.

The proposed zoning amendment is nearly 800 pages long, it will not streamline the regulations, are confusing, and still lack clear objective standards that are not subjective in nature and can be interpreted in ways resulting in capricious and arbitrary decisions.

Objections

Objections are being made to the proposed zoning amendments including the modifications to the land use, density, subdividing of property, parking, and development standards (including, but not limited to building heights, setbacks, floor area ratios) that are not beneficial or wanted by our citizens. The amendments will not protect and promote the comfort, convenience, prosperity and general welfare of our citizens under proposed Section 20.101.020.

Objections are being made to the parking space requirement under Section 20511.040.F. that allow for the Director of Development Services or the Planning Commission to permit reduced parking standards for shared parking. The city is already experiencing a shortage of on-site parking and this will just amplify the problem. Clarity is also needed on the required parking space for AHO and MUO development that may or not be subject to the standards of Gov. Code 65915(p). Clarity is also needed for procedures to restrict on-site parking during certain hours of the day and the issuance of parking permits for residence.

It is also argued that the numerous changes to the current code are vague, unclear, and lack the clarity necessary to streamline the zoning regulations to facilitate economic development in accordance with the general plan. It is argued the lack of clarity is inconsistent with the Gov. Code, including Sections 65860 and 11349.

Objections are also made to the required public notices and appeal rights of decisions made by the Director of Development Services. The proposed amendments result in ambiguous and lack transparency for the reasonable appeal rights under Section 20.602 of the amended Zoning Code. The decisions made by the Director of Development Services should be defined objectively and not allow subjective interpretations of an overly complicated zoning code.

Objections are also being made to the changes of current Zoning Code 20.09.090 that are throughout the newly drafted zoning ordinance relating to overlay districts for affordable housing overlay sites for (AHO) districts and the mixed use overlay (MUO) districts. The newly drafted ordinance now defines the former AHO and MOU sites under numerous and various sections of the proposed amendments. There is a lack of clarity if AHO and MUO district are a subset and associated to RMU (Regional Mixed Use); BMU (Business Mixed Use) and EMU (Employment Mixed Use) districts. The proposed amendments and changes are to land-use, zoning, and RHNA site development standards—which should be reviewed by Department of Housing and Community Development (HCD) to ensure the city remains in substantial compliance with state housing law and the city's housing element per Gov. Code 65585. The city has not demonstrated how such notice to HCD will be completed in accordance with Gov. Code § 65585.

These objections as noted above and to be more specifically described below concern adverse conditions to surrounding neighborhoods and potential violations of affordable housing laws, including Gov. Code Sections 65983 and 65915.

Objections are made, but are not limited to the following chapters/sections or tables:

20.101.020; 20.102.030; 20.103; 20.103.110; 20.201; 20.201; 20.102-030; 20.202.040; 20.202.050; Table 20.202-1; Table 20.202-2; 20.202.040; 20.202.050.E.; Table 20.204-1; Table 20.205-1; 20.205.020; 20.205.040; 20.206; 20.511; Table 20.511-2; 20.511.040; 20.301; 20.305; 20.305.010; 20.306; Table 20.306-2; Table 20.306-3; Table 20.306-4; 20.306.040; 20.306.050; 20.306.060; 20.501-030; 20.511.040; 20.512.030; Table 20.601-2; 20.602; 20.602.050; 20.602.090; 20.602.100; 20.602.103; 20.602.160; and Table 20.602-2, 20.603.100

Effects of New Commune DTLA LLC v. City of Redondo Beach

Unlawful Use of Overlay Sites in Affordable Housing Districts

The draft amendment fails to remove from the RHNA obligations when property will be subdivided and acreage will be used only for commercial usage. The results of the Redondo Beach decision would require the acreage dedicated to exclusively commercial usage would need to be removed from the RHNA calculation for the subdivided acreage under Gov. Code § 65583.2.

As example, the Eden development of 9.82 adjusted acres, was clustering all the residential usage on approximately 5 acres, resulting in about 4.82 acres being used for commercial development without any residential development on the subdivided acres. With an RHNA obligation of 26 units per acres, the realistic capacity would be on 130 units on the five acres, with the approximate 4.82 commercial acreage being subject to development standards for commercial usage and not residential standards. The land used for about 4,82 acres in the Eden development was not for residential capacity and does satisfy the realistic capacity as set-forth by the HCD.

Under state law, the developer could use SDBL under Gov Code 65915(f) and build at the base density of 30 units (150 units or 180 units) with a 10% low income inclusion. However, to build 264 units on 5 acres, with a density of over 52 units per acre would need to include higher percentage calculations for low income housing under the Table § 65915(f). Furthermore, since the additional units would require a density bonus of over 50%, the development would require additional stacking under AB 1287.

Based upon the Redondo case , the city improperly allowed the clustering of residential usage on the 5 acres without reducing the RHNA obligation or requiring higher SDBL low income percentages. While the Bankers Hill 150 decision allows unlimited waivers under Gov. Code§ 65915(b) and (e), these are for development standards and do not reduce the low income inclusion percentage under § 65915(f).

The city should objectively clarify the Redondo Beach decision within the draft zoning ordinance. Wherein the city cannot force the developer to include residence usage on subdivided parcels, it must be made objectively clear that the acreage dedicated to exclusively commercial usage will be removed from the RHNA obligations capacity. While the city could not stop the developer from subdividing, the reduction in RHNA capacity will be counted to the city's "No Net Loss" calculations. The revised zoning code and ordinance should contain unambiguous language that the overall site RHNA capacity will be reduced under the developer subdividing the property and the higher density per acre would be subject to the provisions of § 65915(f).

The city should also remove from the draft zoning code and ordinance the ability for developers to transfer floor area ratio (FAR) from one site to another under Section

20.202.050E., and the development bonuses under Section 202.202.050A. & B. These two types of incentives are deemed to be no more than a devious method to circumvent the lawful requirements of the “Redondo Beach” case.

The above lawful practices would not be subject to the same unlimited waivers as allowed in the Bankers Hill 150 court decision. The Redondo Beach case deals specifically with the Housing Element Law and zoning overlays. The Bankers Hill case deals with the development standards, in which § 65915(f) is not included.

Effects of Bankers Hill 150 v. City of San Diego

Allowing Unlimited Waiver under Gov. Code Sections 65915(b) and (e)

It is recognized that the Bankers Hill 150 case has put significant restrictions on a city’s ability to have objective development standards. Developers can claim unlimited waivers to development standards and cities can no longer enforce these objective standards unless it compromises health or safety. It should be noted that the Eden development would not have been able to claim unlimited waivers since only 9% low income units were included in the development. Under Bankers Hill, in order to qualify for unlimited waivers, a developer would need to include 10% low income or 5% very low income units.

In spite of the Bankers Hill 150 ruling, there are still possible strategies a city can use to mitigate the unlimited waivers that developers can claim. The draft zoning code under Section 20.306.060A., allows for horizontal development and should be revised and removed. The city could ban horizontal subdivisions and also institute a land use of Vertical Mixed-Use (VMU) design framework which allow for ground floor commercial baselines and upper floor residential decks.

The city could also prevent clustering by Site Capacity and Density Transfers regulations. While there are limits to the city’s ability, if a city designates a site for housing in its Housing Element, the city can cap the maximum non-residential footprint to ensure the site’s overall housing capacity is not compromised and to spread uniformly the residential usage across the site (a modified horizontal mixed use by acreage regulation). Similar to Section 20.202.050E., the transferring of density within the land use standards in the General Plan could require even distribution of both residential and commercial usage in RHNA sites.

While the above limitations are not flawless, the city could make an attempt to enact such regulations, if even for developments that do not meet the lower income inclusion percentages of Gov. Code § 65915(b) & (e).

The city should at least make a verifiable effort to prevent the clustering of residential units in only a portion of the RHNA sites.

Parking Issues

Objections are made to the ability to provide up to 50% or more in reductions in parking spaces as allowed under Section 20.511.040.F. of the draft zoning amendment. Chino is already experiencing shortages in on-street parking and the increase in high density housing developments will only exacerbate the problem.

Wherein Section 20.511.040.F.6., for affordable housing projects discusses Gov. Code § 65915, no such clarity is provided in Section 20.511.040.F.5., for mixed use projects. Minimum standards should be established for the mixed use project.

It should be noted that the Eden project only included 9% low income housing and this percentage did not meet the minimum standards of the 10% requirement as provided in § 65915(b) of the Gov. Code. Therefore, it appears the Eden project was not eligible for under state standards for the reduced parking requirements under § 65915(p). The city was under no state mandate to provide reduced parking for the Eden project. This is a type of error that should be prevented in the revised zoning code.

Based upon the confusion and critical issues with off-street parking for mixed use and affordable housing sites, it is recommended that the Director of Development Service be remove from final approval authority and that only the Planning Commission approve such reduced parking requirements in affordable housing projects. Such reduction and waiver authority should be handled in the same manner as the provision of Section 20.512.030.C. A public notice and hearing before Planning Commission should be conducted for any reduction in parking standards under Section 20.602.050 and Table 20.602-2.

Greater clarity and objective standards are also deemed necessary for parking restrictions and parking permits that are found currently under the Municipal Code, Chapter 10. Many in the city feel with the increase density in housing developments and the limited number of on-street parking spaces may require restricted overnight parking and the need for citizens to obtain parking passes for their local neighborhood. It is recommended that such procedures needed to establish no overnight parking zones and neighborhood parking passes be enhanced in the revised zoning code to coincide with Chapter 10 of the Municipal Code.

Complexity and Lack of Clarity in Revised Zoning Code

The proposed draft is over 500 pages long and does little to streamline the process of housing developments in Chino. There is complexity and confusion between the newly created RMU, BMU and EMU districts compared to the mixed use AHO and MUO overlays, since both the RMU and BMU described in Section 20.202.020 of the revised zoning plan also have residential units permitted inclusion. The bonus and FAR allowed under Section 20.202.50 are also confusing. Throughout the entire revised zoning code it is difficult to follow and comprehend the regulations. One of the common arguments made by developers is the costs of fees and permits to build in Chino. An objection is made to the difficulty in understanding the revised zoning code, and it is recommended that the revised zoning code be streamlined for greater efficiency and understanding.

The lack of clarity between BMU development standards in Table 20.202-2, such as number of stories, height in feet, and FAR are not consistent with Section 20.306.080 and Table 20.306-4 for MUO districts. It is recommended that the development standards for BMU districts that permit residential inclusion be consistent with the development standards for MUO districts.

It is also argued that the numerous changes to the current code are vague, unclear, and lack the clarity of Gov. Code § 11349 and the consistency of § Gov. Code §5860 be improved in the revised zoning code.

Floor Area Ratio (FAR) and Building Height Calculations

Objections are made to the possible increased density in many of the new developments being permitted in Chino. The city can comply with the RHNA capacity obligations in the Housing Element and allow the allowable FAR defined in Section 20.103.110 to include all buildings on a site area. This seems to be in conflict with Table 20.306-6. In the past the meaning of Table 20.306-6 had been interpreted by the Director of Development Services to exclude residential buildings from the FAR. This same Table 20.306-6 also allows greater building heights of 50 feet and Section 20.306.080C., allows floors up to 4 stories, wherein Table 20.202-2 allows 3 stories and 40 feet high. The newly drafted zoning code also allows for the building separations to only pertain to residential units. This must be changed to include commercial buildings on the same site. The city does not need greater density by cramming buildings right next to each other in a RHNA residential development and creating the visual effect of less open space. .

It is requested that the inconsistency and confusion between Sections 20.202.110 and 20.306.080 be clarified and resolved. The citizens were informed that the buildings would be reduced to only 3 stories in MUO districts, yet the development standards under Table 20.306-4 still allow building heights up to 50 feet and four stories.

Allowable Density

Objections are made to the allowable density in MUO sites. The issue of density was a topic staff was to review under the motion made by the council during the city council meeting on November 18, 2024.

Under Table 20.306-2 the allowable density in MUO districts is a minimum of 26 units per acre with an allowable base density of 30 units per acre. In the HCD certified Housing Element the net capacity for RHNA obligations was only 20 units per acre because HCD made an allowable 80% development factor to account for existing and future non-residential uses on each parcel. Thus under HCD standards 20 units per acre would satisfy the RHNA capacity for mixed use overlays in RHNA sites.

The city has made a feeble argument that it submitted an inquiry with HCD to reduce the allowable minimum density on RHNA sites, but cannot do anything because HCD never responded. An objection is made that this is not a valid and acceptable argument. The city has a responsibility to listen to its citizens and take all appropriate actions to resolve this important density issue. The failure of getting a response based upon a half-hearted attempt by the city staff to resolve the density issue is deemed to be lackluster and disinterested reaction to the valid concerns of its citizens.

It is recommended that since the revised zoning code directly relates to building heights, FAR calculations and the removal of storage facilities from RHNA sites are legal standards that would require a draft Housing Element revisions notification to HCD, the city should proceed with submission of the draft revision of the zoning code to HCD. Even more important, the city also has the ability to submit within the draft zoning code to HCD, revised density calculations in MUO sites from 26 to 20 units per acre. The city has a legal right to submit a draft revision of the Housing Element concerning the development standards and density to HCD under Gov. Code §65585. More importantly, HCD has a legal mandate to provide a written response in 60 days for subsequent draft submittals under § 65585(b)(1)(C).

The city has a legal right to require that HCD respond in writing to a revised draft to the Housing Element. The citizens of Chino have the right to expect its officials to perform their jobs in a diligent manner. The city has a greater right and responsibility to make HCD do their job and provide a written response for the submission of a draft revision to the Housing Element.

Our city officials need to do is listen to the valid concerns of its citizens and submit a draft revision to the Housing Element to HCD concerning the changes to building heights, the methodology for FAR calculations, the removing of the inclusion of storage facilities in MUO sites, and most importantly, revising the Housing Element to a lower density in mixed use overlay to a capacity of 20 units per acre in MUO sites that already had been approved by HCD.

It is also a frivolous argument by the city that in November of 2024, they could not make an adjustment to the Housing Element without prior approval by HCD, but now they are not required to notify HCD of the changes in height, FAR, and excluding storage facilities in MUO sites. It has taken the city over 18 months and developers can still build developments with four stories, 50 foot heights and storage facilities. Someone must take the responsibility to get the job done.

Variances to Zoning Code, Interpretations, Appeal Rights and Procedures

Objections are made to the lack of clarity in the objective standards of the difference between minor and major variances as described in Section 20.602.100. Greater clarity in the objective standards rather than a subjective interpretation of the Director of Development Services need to be defined in the new draft of zoning code revisions.

Objections are made to the allowable limits in Section 20,501.030B.3. of 10 feet for a structure to be approved by Administrative Approval. All variances in the height of a structure should be approved by the Planning Commission or acknowledged by the Planning Commission under the provisions of 20.512.030 which require public notice before the Planning Commission. Greater clarity is needed as what constitutes Administrative Approval.

Objection is made to definition of an “aggrieved person” under Section 20.102.030. It is too restrictive. Challenges to interpretations and decisions concerning development standards that can affect the city or surrounding neighborhoods are not limited to a 300 foot radius of a MUO high density development. All residents should be able to obtain a written interpretation and decision and the ability to appeal these important issues. As example, using the limited radius provided of 300 feet, numerous affected citizens of the Eden project would have been denied reasonable access to important information and to be able to challenge poorly decided decisions. . It would appear this is no more than a disingenuous attempt to limit and stifle citizen involvement in important issues that pertain to all citizens of Chino. The term “aggrieved person” should be changed to “citizen of Chino”.

Objection is made to Table 20.601-2 and the lack of clarity for “*Administrative Action - wherein the noticing requirements shall be the same as that required for the administration action or decision being appealed*”. Administrative Action is also not defined in the glossary under Chapter 20. There are numerous subjective standards being allowed to be decided by the Director of Development Services, including 20.501.030.B, the differences between the objective standards for: a minor or major variance and Section 20.603.080; the objective standards for minor or major modifications under Section 20.602.100.

Objection is also made to Table 20.601-2 which under the “Additional Regulations” column cites 20.601.C.2 & 3 & 4. Such references do not appear under Section 20.601.C. The zoning code needs greater clarity in what constitute an appealable administrative action and how it differs from an administrative approval under 20.603.100.

Objections are made to the lack of greater clarity when written findings are to be made, including those under Section 20.602.070. It is recommended that enhance reporting requirements be made that all written decisions of the Director of Development Services be entered onto a log and be posted to the city’s website in a manner so simple access can be made by concerned citizens. Citizens should be able to submit a written request to be informed by email of any updates to this log.

The issue of lack of transparency in development decisions made by city staff is an ongoing problem. Better communication procedures should be enacted with accessible reporting requirements and not backroom decisions being made outside the scope of citizen involvement.

A minor objection is made to the removal of Section 20.602.050.D.1.e., wherein the posting of notice signs that can be easily read from 60 feet have been omitted. If a public notice sign is to be posted it should be readable.

It is recommended that corrective actions be taken on the above objections.



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June 17, 2026

Planning Commission
City of Chino
13220 Central Avenue
City Council Chambers
Chino, CA 91710

Respected Planning Commissioners:

Please consider this formal public comment letter on behalf of the City of Pomona for *Comprehensive Zoning Code Update PL24-0146 (Zoning Ordinance Amendment) and PL25-0108*, to be considered at the regularly scheduled Planning Commission of the City of Chino on Wednesday, June 17, 2026.

We would like to formally acknowledge that the City of Chino's Development Services staff continues to be an active, collaborative partner with the City of Pomona, and have been transparent and forthcoming with their land use and zoning efforts, which is very much appreciated. We are confident that our continued conversations can strengthen the health and quality of life of the entire region for both Pomona and Chino residents. Staff provided us an opportunity to review a draft of the zoning code. We have had the opportunity to fully review the document and would like to put into the record the following points of feedback.

Comment #1: Strengthening Definitions of Fulfillment and Logistics and Prohibiting in Business Park and M-1 zoning districts

The City of Pomona is pleased to see the addition of good neighbor policies and standards consistent with State law concerning warehousing and logistics facilities. With that said, aside from the definitions contained within 20.514.590, there does not appear to be Glossary definitions of "fulfillment," "logistics," and related land uses. In Pomona's experience, the lack of clear zoning definitions for these uses has been problematic, as third-party logistics, less than truckload, and other fulfillment-oriented uses have been able to secure business license and zoning clearance relying on broader Glossary definitions for "warehousing" or "wholesale." This can enable truck-intensive and continuously operating fulfillment houses on even small footprints in business parks. ***We request adding Glossary definitions for fulfillment-oriented uses to create the full throughline to the new good neighbor policies and ensure wrap-around***





office of economic + business affairs

department of administration

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Enforcement, and then establishing prohibitions for these uses (other than Microbusinesses or Microfulfillment) in Business Park and M-1 zoning districts, or alternatively prohibited within a designated measured buffer from City of Pomona borders . Excerpted below are some of Pomona’s definitions that were added in the 2024 zoning code update, as reference.

530.J. Fulfillment-Oriented Industrial Uses

1. *Microbusiness* A single business between 2,500 and 22,500 square feet in size that engages in at least two of following activities: Production, Artisanal Manufacturing, Distribution, Fulfillment. Includes Commercial Cannabis Microbusiness pursuant to the Pomona City Code (Ch. 68) within the Commercial Cannabis Permit Program Overlay District Sub Area 3.

2. *Production Fulfillment* Any use that is primarily storage and direct distribution of products to end users within the supply chain (“business to business” or “business to consumer”), sorted, picked, and/or packed either manually or with automation, in either a traditional or a high-cube format. Includes receiving and processing of bulk goods and individual order processing. Excludes Retail and Large Format Retail. Includes e-commerce, third party logistics, on-demand transportation, and freight forwarding.

3. *Production Transportation* Any facility that is involved in product fulfillment or product distribution of bulk goods primarily through the use of truck trailers and truck tractors for truckload services within the supply chain (“business to business” or “business to consumer”). Includes full truckload, less than truckload, trans-loading, consolidations, de-consolidations, cross-dock, and other on-demand transportation services

Comment #2: Prohibiting Recycling Facilities, Light Processing in M-1 zoning district.

The City of Pomona has prohibited recycling centers, pallet yards, and other waste-oriented facilities since 2017 and have serious concerns about new recycling centers being established along our shared border. The proposed zoning code does prohibit certain recycling centers depending on the zoning district, but still permits by Conditional Use Permit Recycling Facilities, Light Processing” within the M-1 zoning district. The excerpted definition of this use is as follows:

Recycling facilities, light processing. A facility used for the collection and processing of recyclable materials that occupies less than forty-five thousand square feet of gross collection, processing and storage area; and has an average of up to two out bound truck shipments per day. Light processing facilities are limited to baling, briquetting, crushing, compacting, grinding, shredding, and sorting of source-separated recyclable



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materials, and repairing of reusable materials sufficient to qualify as a certified processing facility. The facility shall not shred, compact or bale ferrous metals, other than food and beverage containers. For the purposes of these provisions, "processing" means the preparation of materials for efficient shipment, or to an end-users specifications, by such means as baling, briquetting, compacting, flattening, grinding, crushing, mechanical sorting, shredding, cleaning, and/or manufacturing.

The City of Pomona is concerned about the aforementioned definitional activity locating along our shared border, as many of the elements identified, including crushing, grinding, and shredding, have historically enabled facilities that have run afoul of environmental protection laws. **We request re-designating "Recycling Facilities, Light Processing" as "prohibited" within the M-1 zoning district, or alternatively prohibited within a designated measured buffer from the City of Pomona borders.**

Comment #3: Prohibiting New Truck/Trailer Storage in M-1 zoning district.

The proposed draft enables "**New Truck/Trailer Storage**" via a Development Agreement. The City of Pomona has concerns about increased truck and trailer traffic and impacts beyond those that exist today along our shared borders. These uses are not currently permitted within our zoning code along said border. While a development agreement has the potential to address site specific concerns, it is a high risk that can exacerbate cumulative environmental impacts that are currently in these neighborhoods caused by heavy truck and trailer traffic. **We request re-designating "New Truck/Trailer Storage" as prohibited in the M-1 zoning district, or alternatively prohibited within a designated measured buffer from the City of Pomona borders.**

Comment #4: Adding clarity on data center radius restrictions for Pomona and non-Chino residents.

The City agrees with prohibitions on Data Centers in the M-1 zoning district, and additional radius restrictions when adjacent to residential uses. **We request clarifying the language on residential proximity to Data Centers to include clear language that residential uses are inclusive of all residences, even beyond the City of Chino borders that are captured within the radius measurement.**

Comment #5: Prohibiting stand-alone Battery Energy Storage Facilities in M-1 zoning district.

Battery Energy Storage Facilities (BESS) are an evolving land use that is being investigated with varying levels of risk management depending on the Fire departments.



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We are concerned with permitting a standalone BESS facility along our shared border that could have thermal runaway risks that affect residents. ***We request redesignating Battery Energy Storage Facilities as prohibited in the M-1 zoning district, or alternatively prohibited within a designated measured buffer from the City of Pomona borders, but still permitting it as ancillary or supportive use for resilience or facility energy backup.***

On behalf of the City of Pomona, we sincerely appreciate the opportunity to comment, your Staff's willingness to openly and transparently work across our shared borders, and remain hopeful for the future health and wellness of our communities.

Sincerely,

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