

5-28-2026

Regarding Planning Commission Item #4, Legistar #26-0832

I object to the action being taken by the Planning Director.

First and foremost, this project must be heard by the Planning Commission, after an environmental study and required documents are completed, and with enough time to be reviewed by the public and the decision makers.

Many of the actions being taken will be impacting to the county and it's residents, therefore this project is not Statutorily and Categorically exempt from the California Environmental Quality Act (CEQA). By modifying the zoning ordinance, the General Plan is also being amended without the ability for oversight. Where in state law is it given that the Planning Director the authority to modify a General Plan, let alone, "re-interpret" the plan or zoning ordinance?

Why does the county constantly go out of its way to avoid transparency and public involvement? Why not do this the right way?

Regarding modifying zoning for Industrial Districts. Planning is really making this more complicated than it needs to be. Distribution is allowed in Industrial, but projects also have to comply to level of service traffic capacity requirements.

Distribution Centers should only be allowed in IH.

If the County would stop ignoring the law, the Traffic and Circulation Element would take care of those projects that are not compatible with the land use, no matter what the zoning.

Also, Research and Development Zoning was never intended to support heavy truck traffic with its noise, fumes, and traffic impacts. Those heavy industrial uses are expected and allowed within the Heavy Industrial Zone not within Research and Development. To correct this misunderstanding, the county only needs to disallow storage and distribution under R&D and then add a line that allows storage only secondary to the primary use.

The County needs to pull out the General Plan to see the intent of these different categories.

1. intent of Research and Development (R&D) was not meant for Heavy truck traffic activity:

It is obvious that the R&D Zone was not intended for high trucking activities such as what is being proposed. That activity is more appropriate for Industrial-Heavy (IH) as shown below:

130.23.010 Zones Established; Applicability

A. This Chapter establishes several Industrial zones to provide for a full range of light and heavy manufacturing, including manufacturing, processing, distribution and storage. In addition, a Research and Development Zone is established to provide areas for high technology, non-polluting manufacturing plants, research and development facilities, corporate/industrial offices, and support service facilities in a rural or campus-like setting, such as a business park environment. [See General Plan Policy 2.2.1.2 (Land Use Designations)]

B. This Chapter further provides regulations applicable to each industrial zone established in Section 130.12.020 (Zoning Maps and Zones) in Article 1 (Zoning Ordinance Applicability) of this Title. The Industrial zones are as follows:

1. Industrial – Light (IL). The IL zone is applied to lands for manufacturing and associated retail or service activities, wholesaling, and other industrial uses, where the primary activity is conducted within a building or buildings, or in outdoor storage or activity areas. Conditional Use Permits shall be required for those uses which, by their nature, have the potential to produce or emit noise, odor, fumes, dust, smoke, vibrations, glare, heat, electrical interference or waste material beyond the confines of the property boundaries.

2. Industrial – Heavy (IH). The IH zone is applied to areas which may also be suitable for more intensive industrial uses, including manufacturing, assembling, fabrication and processing, **bulk handling, storage, warehousing and trucking.** **The uses associated with this district are likely to generate significant levels of truck traffic, noise, pollution, vibration, dust, fumes, odors,** radiation, radioactivity, poisons, pesticides, herbicides, or other hazardous materials, fire or explosion hazards, or other undesirable conditions. **A Conditional Use permit is required for uses having the potential to pose a safety hazard or produce particulate matter.** Heavy industrial districts are unsuitable adjacent to residential districts and some commercial uses. Dwellings, care centers, and certain commercial uses are not allowed. Uses allowed within IL (Light Industrial) districts are allowed, provided that the uses are subordinate to and do not restrict heavy industrial uses in the zone. **Activity at heavy industrial sites consists predominantly of trucks, rather than passenger vehicles, and the road system is built to support truck traffic.** Provisions for pedestrians are not required.

3. Research and Development (R&D). The R&D, Research and Development zone is intended to provide areas for the location of high technology, non-polluting

manufacturing plants, research and development facilities, corporate and industrial offices, and support service facilities in a rural or campus-like setting, such as a business park environment.

The General Plan Policy 2.2.1.2 mentions above:

General Plan Goal 2.2: Land Use Designations

A set of land use designations which provide for the maintenance of the rural and open character of the County and maintenance of a high standard of environmental quality.

Objective 2.2.1: Land Use Designations

An appropriate range of land use designations that will distribute growth and development in a manner that maintains the rural character of the County, utilizes infrastructure in an efficient, cost-effective manner, and further the implementation of the Community Region, Rural Center, and Rural Region concept areas.

Policy 2.2.1.2 To provide for an appropriate range of land use types and densities within the County, the following General Plan land use designations are established and defined.

Research & Development (R&D): The purpose of this land use designation is to provide areas for the location of high technology, nonpolluting manufacturing plants, research and development facilities, corporate/industrial offices, and support service facilities in a rural or campus-like setting which ensures a high quality, aesthetic environment. This designation is highly appropriate for the business park/employment center concept. Lands designated as R&D can be located in Community Regions and in Rural Centers.

Sue's Comments:

The uses allowed by right in the R&D zoning is "light" manufacturing, printing and publishing, research and laboratory services, "lightweight nonferrous" metal casting foundry and producing less impacting ceramic products from clay, and "wholesale" storage and distribution. The few other uses, either require a conditional or temporary use permit. It is clear that neither the R&D or Light Industrial are meant for heavy warehousing and trucking, and that wholesale storage and distribution was meant to be secondary to the primary use.

130.23.020 Matrix of Allowed Uses

Uses are allowed in the following zones subject to the requirements of this Title as designated in Table 130.23.020 (Industrial / R&D Zones Use Matrix) below in this Section:

Table 130.23.020 – Industrial / R&D Zones Use Matrix

IL: Industrial Low IH: Industrial High R&D: Research & Development	P Allowed use (Article 4: Special Use Regulations) A Administrative permit required (130.52.010) TUP Temporary use permit required (130.52.060) CUP Conditional use Permit required(130.52.021) MUP Minor use permit required (130.52.020) TMA Temporary mobile home permit (130.52.050) — Use not allowed in zone			
USE TYPE	IL	IH	R&D	Specific Use Reg.
Industrial				
Automotive and Equipment: Salvage and Wrecking Yard	CUP	CUP	—	
Hazardous Material Handling	CUP	CUP	CUP	
Industrial: General	P/CUP	P/CUP	CUP	
Specialized	CUP	CUP	—	
Laundries, Commercial	P	—	—	
Light Manufacturing	P	—	P	
Ceramic products from compounded clay	P	—	P/CUP ¹	
Lightweight nonferrous metal casting foundry				
Mineral Exploration and Mining	See Table 130.29.070.1 (Mineral Exploration and Mining)			
Printing and Publishing	P	—	P	
Research and Laboratory Services	P	—	P	
Slaughterhouse	CUP	CUP	—	

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USE TYPE	IL	IH	R&D	Specific Use Reg.
Storage Yard: Equipment and Material Permanent	P	P	CUP	130.40.320.C
Temporary	TUP	TUP	TUP	
Wholesale Storage and Distribution	P	P	P	

As you see in the land use Designation, R&D is allowed in Industrial, but neither Light or Heavy Industrial is allowed in R&D:

TABLE 2-4 GENERAL PLAN LAND USE DESIGNATION AND ZONING DISTRICT CONSISTENCY MATRIX													
Zoning Districts*	Land Use Designations*												
	MFR	HDR	MDR	LDR	RR	AL	NR	C	R&D	I	OS	PF	TR
RM	•							• ¹				•	
R1		•	Δ									•	
R20K		•										•	
R1A		•	•									•	
R2A			•									•	
R3A		•	•									•	
RE (-5-10)			• ²	•	• ²							•	
CPO								•				•	
CL								•				•	
CM								•				•	
CC								•				•	
CR								•				•	
CRU												•	
CG								•				•	
R&D									•	•		•	
IL										•		•	
IH					•	•	•			•		•	
LA (10-160)				• ⁴	•	•	•				• ³	•	
PA				• ⁴ ★	•	•	•				• ³	•	
RL (10-160)				• ⁴	•	•	•				• ³	•	
AG (40-160)				★	•	•	•				• ³	•	★
TPZ				•	•	•	•						
FR					•	•	•					•	
RFL	•	•	•	•	•		•				•	•	•
RFH	•	•						•			• ⁵	•	•
OS	•	•	•	•	•	•	•				•		•
TC	•	•	•	•	•	•	•	•	•	•	•	•	•
Notes:													
• – Consistent with General Plan Policy													

There are many other policies that limit heavy truck traffic including Caltrans regulations. We should not be adding Distributions Centers to Light Industrial and instead should be modifying the wording under Research and Development to make it clear that R&D does not allow for Distribution Centers. Please refer these issues back to Planning and

prepare a environment review for all of the changes that will be impacting to the community.

Thank you,

Sue Taylor

Sue Taylor for Save Our County