

CITY OF CARSON

10-Day Report on Interim Ordinance No. 17-1615U

April 18, 2017

On March 21, 2017, the City Council of the City of Carson adopted Interim Urgency Ordinance No. 17-1615U, enacting a moratorium on the establishment, expansion, or modification of truck yards, logistics facilities, hazardous materials or waste facilities, container storage, and container parking within the City, as defined in Ordinance No. 17-1615U, Exhibit A.

The purpose of the moratorium is to allow the City time to thoroughly review, study, and revise the City's laws, rules, procedures and fees related to logistics businesses in the City of Carson. The potential impacts of new development and expansion or modification of existing buildings or sites subject to this Moratorium necessitates further analysis of the subject. The moratorium was enacted pursuant to Section 65858 of the California Government Code, took effect immediately, and will expire on May 5, 2017, unless extended by the Council.

Subdivision (d) of Section 65858 of the Government Code provides that "[t]en days prior to the expiration of that interim ordinance or any extension, the legislative body shall issue a written report describing the measures taken to alleviate the condition which led to the adoption of the ordinance."

This report complies with the requirements of Government Code section 65858(d). During the period the moratorium has been in place, the City has taken the following initial steps to analyze the impacts of the projects subject to the Moratorium:

- On March 21, 2017, the City Council formed an Ad-Hoc Committee (Committee) to discuss and provide input on the Moratorium. The City Council appointed the Mayor and Councilman Santarina, and the chairs and vice-chairs of the Planning Commission, the Environmental Commission, and the Economic Development Commission to the Committee. In addition, the Mayor requested the industry to appoint two representatives to the Committee. The City Council further set the first meeting of the Committee for March 28, 2017. The Committee has met three times, Exhibit B.
- On March 28, 2017, the Committee held its first meeting. Approximately 72 people attended the meeting. The representatives of the industry requested the Mayor to add additional industry representatives. Subsequently during the meeting, the industry added two additional representatives for a total of four industry representatives on the Committee. Minutes of the meeting are attached, Exhibit C. The Mayor requested the industry representatives on the Committee to provide their comments in writing, Exhibit D. In addition Carson Companies provided their comments on a separate letter, Exhibit E.
- On April 4, 2017, the Committee met for the second time. Approximately 49 people attended the meeting. The Committee formed four sub-committees to address the four most significant issues raised during the first meeting. The following subcommittees were organized: Lease Provisions, Land Use and Environmental, Road Maintenance and Economic Impacts/Benefits, and Truck

Routes/Sheriff's Department. Minutes of the April 4, 2017 meeting are attached, Exhibit F.

- On April 6, 2017, the Lease Provisions subgroup met. The following are the main recommendations from this subgroup. A more complete summary of the topics discussed is included as Exhibit G. This subgroup is scheduled to meet again on April 17, 2017.
 - The moratorium should not apply to extension of existing leases and new leases for existing buildings unless otherwise identified below:
 - ◆ Logistics businesses with storage of hazardous materials (use fire department classifications) should be subject to the moratorium (applies to existing buildings only).
 - ◆ Logistics businesses next to sensitive uses including residential (committee did not discuss parks and schools but they should be included) should be subject to the moratorium. A map should be prepared to identify the areas of the City which this provision applies (applies to existing buildings only).
 - Prepare a check list of everything a business needs to do to conduct business in the City including storage of hazardous materials.
 - Adopt penalties for violators of City Codes.
- On April 6, 2017, the Land Use and Environmental subgroup met. The following are the main recommendations from this subgroup. A more complete summary of the topics discussed is included as Exhibit H. This subgroup is scheduled to meet again on April 17, 2017.
 - Consider planting trees to help aesthetics and air quality and to some extent noise. This is especially important next to residential areas.
 - In terms of land use consider the following when residential is adjacent to industrial (may not be applicable in all cases, committee needs to identify sensitive areas that these apply):
 - ◆ Buffering standards to identify separation of residential uses from industrial uses such as setbacks, landscaping, walls, etc.
 - ◆ Limit the permitted uses to those consistent with residential.
 - ◆ Restrict hours of operation.

- ◆ Other design and performance measures such as placing loading doors or employee break areas, loud speakers, etc., away from residential areas.
 - Review the exhibit that overlays the truck routes map and the General Plan noise contour map to determine noise impacts from roadway and trucks on adjacent residential areas. In addition, consider noise complaints.
- On April 10, 2017, the Truck Routes/Sheriff's Department subgroup met. The following are the main recommendations from this subgroup. A more complete summary of the topics discussed is included as Exhibit I. This subgroup has not scheduled its next meeting; however it did emphasize that future regular meetings should be scheduled between the City and the industry to ensure proper coordination and communication takes place.
 - Form a committee of trucking industry, Sheriff, City staff to discuss issues related to:
 - ◆ Study current truck routes to determine whether some should be removed or others added.
 - ◆ Explore technologies available to inform truckers about the latest truck routes.
 - ◆ Explore available grant funding.
 - ◆ Examine residents' quality of life issues related to truck routes.
 - ◆ Ensure adequate signage is posted for truck routes/not truck routes.
 - ◆ Use collision, citation, and complaint data available to the Sheriff and Code Enforcement to refine truck routes and address quality of life and safety issues.
 - Share truck route information with logistics companies and make them available during the business license process.
- The Road Maintenance and Economic Impacts/Benefits subgroup is the only subgroup that has not met. The additional time was necessary for this subgroup to review the City's Pavement Management Report. They were tentatively scheduled to meet on April 18, 2017; however, two Committee members could not meet. Therefore the meeting is being scheduled for the week of April 24th.
- On April 11, 2017, the Committee met for the third time. Approximately 25 people attended the meeting. During this meeting, three subgroups and staff reported

back the discussions from their individual groups. Minutes of the meeting are being drafted. The Committee is scheduled to meet again on April 25, 2017. The City has also conducted the following:

- Informed all applicants with pending development applications and building permits of the moratorium. The letter informed the applicants that staff has stopped all work related to their applications due to the adoption of the moratorium. The letter further identified the steps necessary for the applicants to follow to request exemptions and exceptions, Exhibit J.
- Staff has received several requests for exemptions and exceptions and has communicated with the applicants for such requests and is in the process of processing of the requests as expeditiously as possible.
- Created a webpage to upload all documents related to the moratorium to ensure everyone has access to the latest information regarding the moratorium.

Completing the required analysis and the above tasks identified by the Ad-Hoc committee and the initiation of the General Plan and Zoning Code update necessitates extending the moratorium for 10 months and 15 days. This update is expect to take approximately two years. However, staff expects sufficient progress to be made regarding the above tasks in the next 10 months and 15 days. Therefore, the initial 45-day moratorium enacted by Ordinance No. 17-1615U provides an insufficient amount of time to fully study and consider all the above.

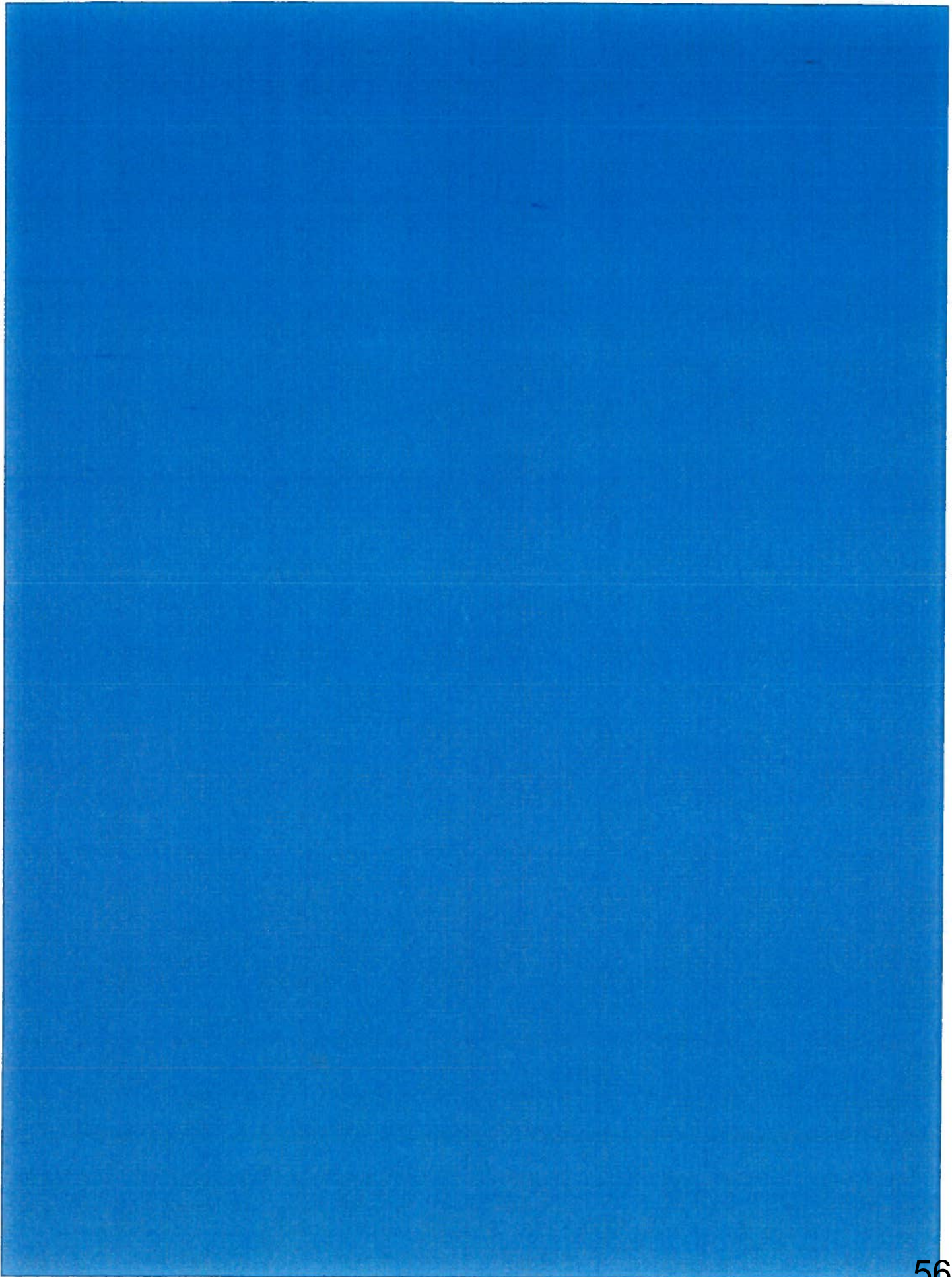
During the period of the extension of the moratorium City staff will continue to perform the following tasks and analyses:

- Update the City's codes to adopt standards for logistics businesses with storage of hazardous materials (use fire department classifications).
- Update the City's codes to adopt standards for logistics businesses next to sensitive uses including residential, parks, and schools. Prepare a map to identify the areas of the City which this provision applies.
- Prepare a check list of everything a business needs to do to conduct business in the City including storage of hazardous materials.
- Adopt penalties for violators of City Codes.
- Consider planting trees to help aesthetics and air quality and to some extent noise. This is especially important next to residential areas.
- Update the City's codes to adopt standards for logistics businesses adjacent to residential areas:
 - Buffering standards to identify separation of residential uses from industrial uses such as setbacks, landscaping, walls, etc.
 - Limit the permitted uses to those consistent with residential.
 - Restrict hours of operation.

- Other design and performance measures such as placing loading doors or employee break areas, loud speakers, etc. away from residential areas.
- Share truck route information with logistics companies and make them available through business license process.
- Form a committee of trucking industry, Sheriff, City staff to discuss issues related to:
 - Study current truck routes to determine whether some should be removed or others added.
 - Explore technologies available to inform truckers about the latest truck routes.
 - Explore available grant funding.
 - Examine resident's quality of life issues related to truck routes.
 - Ensure adequate signage is posted for truck routes/not truck routes.
 - Use collision, citation, and complaint data available to the Sheriff and Code Enforcement to refine truck routes and address quality of life and safety issues.
- Implement the recommendations proposed by the Road Maintenance and Economic Impacts/Benefits subgroup. This subgroup may consider such as economic impact study, fiscal impact analysis, or other studies it deems appropriate.
- Initiate and make substantial progress with the update of the General Plan and Zoning Code as it relates to this moratorium.

Exhibits:

- A. Ordinance No. 17-1615U
- B. The Committee Meeting Schedule
- C. Ad- Hoc Committee Minutes, March 28, 2017
- D. Ad-Hoc Committee Comment Letter
- E. Carson Companies Letter
- F. Ad-Hoc Minutes, April 4, 2017
- G. Lease Subgroup Meeting Summary
- H. Land Use and Environmental Subgroup Meeting Summary
- I. Truck Routes and Sheriff Subgroup Meeting Summary
- J. Exemption and Exception Process Letter



ORDINANCE NO. 17-1615U

AN INTERIM URGENCY ORDINANCE OF THE CITY OF CARSON, CALIFORNIA, IMPLEMENTING A 45-DAY TEMPORARY MORATORIUM ON THE ESTABLISHMENT, EXPANSION, OR MODIFICATION OF TRUCK YARDS, LOGISTICS FACILITIES, HAZARDOUS MATERIALS OR WASTE FACILITIES, CONTAINER STORAGE, AND CONTAINER PARKING IN THE CITY OF CARSON, AND DECLARING THE URGENCY THEREOF

The City Council of the City of Carson hereby ordains as follows:

SECTION 1. AUTHORITY AND EFFECT

- A. The State Planning and Zoning Law (Cal. Gov't Code Sections 65000, et seq.) broadly empowers the City to plan for and regulate the use of land in order to provide for orderly development, the public health safety and welfare, and a balancing of property rights and the desires of the community and how its citizens envisions their city.
- B. This Interim Urgency Ordinance is enacted pursuant to the authority conferred upon the City Council of the City of Carson by Government Code Section 65858 and shall be in full force and effect immediately upon its adoption by a four-fifths (4/5) vote of the City Council as if, and to the same extent that, such Ordinance had been adopted pursuant to each of the individual sections set forth herein.

SECTION 2. DEFINITIONS

The following definitions are applicable to this Interim Urgency Ordinance, unless the context clearly indicates otherwise:

- A. "Big box discount store" shall mean a large retail store whose physical layout resembles a large square or box when seen from above. A big-box store is typically characterized by a large amount of floor space (generally more than 50,000 square feet), a wide array of items available for sale, and its location in suburban areas. Big-box stores often typically offer lower prices because they buy products in high volume. Examples of big box discount stores include WalMart, Costco, Home Depot, Lowe's, TJ Maxx, Smart & Final, etc.
- B. "Cargo container" shall mean any container sufficiently durable for repeated use which, by virtue of its own particular design, permits the temporary storage and protection of bulk commodities, goods, and other cargo, and which may be transported in various modes without intermediate loading or unloading.
- C. "Cargo container storage " shall mean a facility for the storage or stacking of one or more cargo containers.
- D. "Cargo container parking" shall mean a facility for the parking of a trailer, detached from the tractor unit, on which one or more cargo containers may be loaded.

- E. "Director" means the Director of Community and Economic Development, and his/her designee.
- F. "Establishment" means to bring into existence (a new logistics facility).
- G. "Expansion" means:
1. An increase of the total size of the floor area of any existing building area by 10% or more;
 2. Any expansion/intensification of truck yards, cargo container parking, and cargo container storage;
 3. Construction of any new structure on the premises of an existing business;
- H. "Facility" means a temporary or permanent use of land or use of premises, a building or structure, or part of a building or structure.
- I. "Hazardous materials" shall have the same meaning as Section 25501(n) of the Health and Safety Code.
- J. "Hazardous waste" shall have the same meaning as Sections 25117 and 25141(b) of the Health and Safety Code, and Section 40141 of the Public Resources Code.
- K. "Industrial wholesale" means an industrial facility consisting of the exchange of large quantities of goods for future distribution and resale for financial or other considerations.
- L. "Logistics facility" means any warehouse for storage and transportation of goods, distribution facilities, logistics services such as but not limited to material handling, production, packaging, inventory, transportation, storage, warehousing, freight forwarding, deposit, storage, safekeeping, or parts thereof, industrial wholesale, self-storage, portable storage rental facility, truck terminals, hazardous materials and/or hazardous waste facilities, truck yards, cargo container storage and cargo container parking, manufacturing uses with less than 50% of floor area devoted to manufacturing.
- M. "Logistics services" means services including labeling, breaking bulk, inventory control and management, light assembly, order entry and fulfillment, packaging, pick and pack, price marking and ticketing, and transportation arrangement. However, establishments in this industry group always provide warehousing or storage services in addition to any logistic services. Furthermore, the warehousing or storage of goods must be more than incidental to the performance of services, such as price marking.
- N. "Modification" means making any changes, remodeling, or alterations to an existing building or site that require permits. Modification shall include change in tenant at an existing facility requiring a business license. A change in tenant means any amendment to a lease agreement that extends the term of the lease for more than three years, or a new lease agreement with a term longer than three years.

- O. "Permit" means any City planning land use approvals, any new business license tax permit (including the transfer of a business license from one owner to another), and any building, grading, plumbing, electrical, or mechanical permit, whether the approval or issuance is discretionary or ministerial.
- P. "Portable storage rental facility" means operations that rent individual storage containers to members of the public or businesses for the storage of a variety of items.
- Q. "Self-storage facility" means facilities that rent out space to persons for the storage of personal property. Self-storage facilities shall include public storage rental facilities.
- R. "Sensitive land uses" means residences and residential facilities, parks, schools, and hospitals.
- S. "Truck" means all Federal Highway Administration (FHWA) vehicle classes including Class 5 or higher with the exception of dually trucks and Recreational Vehicles.
- T. "Truck yard" means a principal use of land for parking or storage of trucks in active use with or without servicing or repairing of trucks as an incidental use thereto.
- U. "Truck terminal" means a principal use of land or building where there are dock facilities for trucks, either partially enclosed or unenclosed, for the purposes of transferring goods or breaking down and assembling tractor-trailer transport.
- V. "Hazardous waste and/or hazardous materials facility" means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, or recycling of hazardous waste and/or materials. A hazardous waste and/or materials facility may consist of one or more treatment, transfer storage, resource recovery, or recycling hazardous waste management units, or combinations of these units. Health & Safety. § 25117.1.
- W. "Warehouse" means an industrial building used for the freight forwarding, deposit, storage, safekeeping, or manufacture of goods or parts thereof, regardless of whether the goods are offered for sale. Warehouses are used by manufacturers, importers, exporters, wholesalers, transport businesses, customs, etc. They are usually large buildings with loading docks to load and unload goods from trucks. Sometimes warehouses are designed for the loading and unloading of goods directly from railways, airports, or seaports.

SECTION 3. FINDINGS

The City Council of the City of Carson hereby finds, determines, and declares that:

- A. This Ordinance is being adopted in order to allow the City time to thoroughly review, study and revise the City's laws, rules, procedures and fees related to logistics businesses in the City of Carson.
- B. The close proximity of the City to major transportation facilities such as ports, airports, rail, and freeways make the City a desirable location for logistics businesses. Logistics

businesses usually involve one or more of the following: material handling, production, packaging, inventory, transportation, storage, warehousing, freight forwarding, deposit, storage, safekeeping, and hazardous waste and/or materials, hazardous waste . In addition, truck yards and container yards are necessary to serve logistic businesses.

- C. Generally, logistics facilities consume large areas of land that could be used for more desirable land uses such as manufacturing, office, or retail that generate jobs, utility users taxes, property taxes, sales tax, business license revenues, and other revenues. Logistics facilities typically generate a significant number of truck trips to and from the facility, are not likely to employ significant numbers of individuals, and generally do not generate significant sales tax revenue.
- D. Truck trips generated by logistics facilities have direct impacts on the community including traffic, air quality, noise, vibrations, and health impacts on the community.
- E. Truck traffic increases the maintenance costs on roads for the City. For example, a 1999 study for the City of Irwindale concluded that one loaded mining truck causes street damage equivalent to that caused by 10,000 automobiles. *City of Irwindale Mining Reclamation Impact Study*, prepared by Greystone, March 1999, Vol. I, p. iii @ 2.a., and Vol. II., pp. 25-29. A loaded mining truck weighs approximately 80,000 pounds, which is comparable to the average weight of loaded 18-wheeler trucks that commonly traverse the City of Carson to and from logistics facilities. The City intends to further research this issue and determine the impacts of trucks with three axles or more.
- F. Truck trips from commercial and industrial uses in Carson account for approximately 99.9% of all trips generated by Carson land uses (excluding trips going through the City that are not generated from or to the City). Approximately, 83.4% of all trips generated by Carson land uses is generated by industrial uses.
- G. The City of Carson cannot afford to continue to add new facilities that cause extensive damage to the City roads and often contribute little by way of revenue to mitigate these impacts. With the elimination of redevelopment, the City faced an loss of \$30 million annually, and that loss has not been recovered from other revenue sources. The City's structural deficit for FY 17-18 is projected to be \$3 million. This deficit will grow by about \$1 million per year over the next 4 years due to changes at CalPERS and other factors. A preliminary estimate of the FY 21-22 structural deficit is \$9.4 million.
- H. The City's share of every dollar of property tax collected is \$0.0674. This low property tax rate is one of the reasons the City of Carson is not able to adequately budget for the maintenance of roads. As stated in Section E., above, trucks are responsible for causing the damage on our roads and increasing the maintenance costs. This is evident from the condition of the roads in Carson and the lack of appropriate maintenance of the roads today. The City commissioned a Pavement Management Program Study prepared by NCE, dated January 2017. NCE obtained an inventory of pavement conditions for the entire City's street network, to develop strategies for the City to maintain all streets, and to perform budgetary analysis to determine the funding needs, among other tasks.

- I. The report concluded that average Pavement Condition Index (PCI) rating for City's entire 46,555,211 square-foot street network is 67 (a perfect PCI rating score is 100). Sixty-seven PCI is considered "fair" condition for streets with both non-load related (weathering or raveling) and load related (alligator cracking) distress. Generally, streets with load-related distress are more expensive to repair. The report further breaks down the condition of the roads in the City as follows:

Class	PCI	Condition
Arterial	61	Fair
Secondary Arterial	50	Poor
Collector	62	Fair
Residential	75	Good

- J. The study further concluded the City currently has \$92.9 million in deferred roadway maintenance costs. With the current budget of \$1.5 million per year for the next seven years, the deferred maintenance will increase to \$145 million by FY 22/23 while the PCI rating will drop from 67 to 55 in the same time frame. The study also found that in order to maintain the same PCI rating of 67 for the same time frame, the City would have to increase its funding from \$1.5 million per year to \$8 million per year. In this scenario, however, the deferred maintenance only decreases from \$92.9 million to \$87.6 million. Therefore, even with a \$6.5 million increase in annual expenditures, the City's deferred maintenance issue will not be remedied. It is evident, however, that given the state of City's budget, it is impossible for the City to increase the street maintenance budget from its current levels.
- K. The City has approximately 48.2 centerline miles of roads designated as truck routes, and its annual road repair budget is \$1.5 million. As stated above, even in order to maintain the existing level of road conditions, the City has to spend \$8 million per year for the next seven years and still have a deferred maintenance budget of \$87.6 million. This significant increase has a substantial impact on the City's budget. Logistics facilities should pay their fair share to pay of this maintenance.
- L. Reducing roads designated as truck routes is likely to reduce the impacts the trucks impose on City streets. In addition, further limiting truck traffic or hours from arterials with residential uses could reduce impacts on the community. However, an analysis needs to be done on which routes can be removed as truck routes and still ensure adequate truck circulation. The new truck routes must also reduce or eliminated negative impacts on automobile and public transportation traffic. These possible mitigation measures require further study.
- M. Trucks also cause noise and vibration, which cause disturbances and potential damage to businesses and homes that are near truck route roads. Noise and vibration impacts can be reduced by limiting truck routes, by building sound barrier walls along these routes,

restricting the hours certain truck routes can be used, and/or by other noise reducing measures. The City needs to conduct the appropriate studies to identify these impacts and provide recommendations for mitigation measures.

- N. Trucks likely affect air quality, as their emissions are many times those of passenger vehicles, and thus are also likely to have concomitant health effects. Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as diesel particulate matter (DPM). DPM is considered a subset of particulate matter less than 2.5 microns in diameter (PM2.5). Most PM2.5 derives from combustion, such as use of gasoline and diesel fuels by motor vehicles, burning of natural gas to generate electricity, and wood burning. DPM is most concentrated adjacent to freeways, truck routes, and roadways traveled by trucks. PM2.5 is the size of ambient particulate matter air pollution most associated with adverse health effects of the air pollutants that have ambient air quality standards. These health effects include cardiovascular and respiratory hospitalizations, and premature death.
- O. Health impacts can be reduced by employing strategies that improve air quality such as tree plantings programs, building bike lanes and trails, and assisting residents with health related issues. Other long term solutions can include adopting a clean trucks program. For example, zero emission trucks similar to those in the Catenary Drayage Truck for Zero-Emissions Goods Movement demonstration project, found here <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2014/2014-feb7-005.pdf?sfvrsn=2> and <http://www.aqmd.gov/docs/default-source/technology-research/clean-fuels-program/clean-fuels-program-advisory-group---january-29-2015/siemens-catenary-project-update---joe-impullitti.pdf?sfvrsn=7>. The City needs to conduct a the appropriate studies to determine whether a clean truck program would improve air quality in Carson.
- P. In some instances logistics facilities store and transport hazardous waste and/or materials. Hazardous waste and materials facilities present potential dangers to their immediate surroundings and to the community at large; as an example, hazardous gases could be released into the atmosphere as a result of accidents, emissions that are above and beyond those caused by other logistics facilities. Hazardous waste and materials facilities must be strictly regulated and limited in numbers so as to minimize or eliminate the risk of a hazardous materials spill. The Fire Department has identified 170 facilities in Carson that handle hazardous materials.
- Q. Scientific studies have been conducted on the impacts of trucks on surface water quality, specifically copper and zinc pollution issues. Further studies may be required to assess these impairments as they relate to truck traffic on the Dominguez Channel, the Los Angeles River, and Machado Lake that impact the City. The City has adopted an Enhanced Watershed Management Plan that calls out both regional projects and green street implementation to address the impairments, which provides for a compliance schedule and an a cost to implement the program, including potential fines for the City for noncompliance.

- R. Over the next few years, the City will also update its General Plan and zoning code to update its goals and policies for the development of the City. While the City recognizes the value of logistics facilities, the City must balance the interests of such businesses on the one hand, and the well-being of the community, attraction of land uses that create high-paying jobs, and generating revenues to pay for road maintenance, and ensure that logistics facilities mitigate their fair share of fiscal impacts on the City budget. To assess the true financial impacts of logistics facilities on the City's budget, a fiscal impact report needs to be prepared.
- S. The City needs time to evaluate the potential cumulative impacts of logistics facilities, now, before any more of these businesses create further irreversible or costly negative impacts in the community. Furthermore, the City should adopt "good neighbor" standards that reduce impacts of existing or future logistics facilities, on adjacent sensitive land uses.
- T. Many logistics facilities operate 24-hour a day. Limiting the operating hours may address many of the compatibility issues with sensitive land uses.
- U. Fifty percent of land use in City of Carson is devoted to industrial uses. Together with a 0.5% vacancy rate and the strategic location of Carson to the ports of Los Angeles and Long Beach, market forces will only intensify the logistics uses. This intensification could take the form of a second story for logistics facilities, and would further intensify truck traffic through the City.
- V. The advancements in robotics has played a significant role in the quantity of jobs generated by the sector. Logistics facilities, therefore, do not generate jobs the way they used to in the past and may be less desirable for that reason. The City needs to accurately assess the current benefits or impacts on the job market of logistics facilities.
- W. The General Plan's Land Use Element contains the following policies:
1. LU-6.8 Manage truck-intensive uses.
 2. LU-7.2 Locate truck intensive uses in areas where the location and circulation pattern will provide minimal impacts on residential and commercial uses.
- X. The General Plan's Transportation Element contains the following policies:
1. TI-1.2 Devise strategies to protect residential neighborhoods from truck traffic.
 2. TI-1.3 Ensure that the City's designated truck routes provide efficient access to and from the I-405, I-110 and Route-91 Freeways, as well as the Alameda Corridor.
 3. TI-1.5 Require that all new construction or reconstruction of streets or corridors that are designated as truck routes, accommodate projected truck volumes and weights.
- Y. The General Plan's Noise Element contains the following policies:

1. N-2.1 Limit truck traffic to specific routes and designated hours of travel, where necessary
2. N-2.2 Examine the feasibility of implementing sound attenuation measures along the City's arterial streets, particularly along designated truck routes.
- Z. It is anticipated that these policies will be included in the General Plan update, and will likely be strengthened and broadened. The City therefore needs to conduct the appropriate studies to ensure that current and future logistics facilities regulations are consistent with the relevant General Plan policies and will also be consistent with the General Plan update.

SECTION 4. MORATORIUM

- A. Moratorium: During the effective period of this Ordinance, no application for permit will be accepted, no consideration of any application for permit will be made, and no permit will be issued by the City for the establishment, expansion, or modification of any logistics facilities within the City until this Ordinance has expired or has been repealed according to applicable law. Further, all processing of existing applications for permits shall be suspended immediately.
- B. Exemptions: the Ordinance shall not apply to the following:
 1. The annual renewal of an existing business license, any permits necessary for the routine maintenance of the buildings or sites, or any permits necessary for repairs required due to an emergency or to protect the public health, safety, and welfare shall not be considered issuance of a permit.
 2. Tenant improvements for current tenants within an existing building, provided the tenant improvements would not otherwise be considered an expansion or modification of the facility.
 3. Any logistics facility that has obtained a vested property right in the use to which the moratorium applies.
 4. Any logistics facility with 5 or fewer loading doors.
 5. Any new or renewed lease agreement, provided that the term does not exceed 3 years.
 6. Big box stores.

SECTION 5. REVIEW AND STUDY

During the period of this Ordinance, the Director shall review and study the adverse impacts of and the benefits provided by, logistics facilities in the City, so as to quantify the concerns described in Section 3, above, and shall recommend proposed revisions to the City's laws, rules, procedures, and fees related to these facilities, so as to enable the City to adequately and appropriately balance the rights of existing property owners and future applicants who wish to

establish, expand, or modify logistics facilities, with the preservation of the health, safety and welfare of the communities.

SECTION 6. EXCEPTIONS

- A. The City Council may, but is not required to, allow exceptions to the application of this Ordinance if based on substantial evidence presented in writing to the City Council at a Council meeting held no less than 30 nor more than 90 days after the Director's receipt of that evidence, the City Council determines any or a combination of the following:
1. The City's receipt and consideration of an application for a permit to establish, expand, or modify a logistics facilities, within the City's jurisdiction is necessary for the preservation of the public health, safety, and welfare.
 2. Application of the Ordinance would impose an undue financial hardship on a property or business owner.
 3. If an existing building is empty on the effective date of this Ordinance, or a tenant moves out of an existing building during the effective period of this Ordinance, and the property or facility owner wishes to have a new tenant or new use, provided the Council makes the following findings: the new use is permitted or conditionally permitted in the zone; the City Council deems the proposed new use or new tenant to be consistent with the purposes of this Ordinance and the General Plan; and the proposed new use or new tenant will not be in conflict with the contemplated general plan update, any specific plan or zoning code update that the City Council is considering or studying or intends to study.
 4. Land controlled by the City or by any of its agencies and authorities including, transactions approved by the Department of Finance.
 5. The developer or tenant agrees to form or to participate in a Community Financing District (CFD) to pay for ongoing City services, including but not limited to, road maintenance, landscape maintenance, lighting, public safety, storm water management, etc., to the satisfaction of the City Council
 6. The developer or tenant enters into a development agreement that guarantees the City the same financial assurances offered by a CFD.
 7. The fiscal impact analysis for the business shows that the business will not have adverse negative fiscal impacts on the City.
 8. The logistics facility will generate minimal or no truck traffic impacts.
- B. If the City Council determines to allow an exception pursuant to this section, then such applications and/or permits may be filed and processed in accordance with the City's then current regulations and authority, subject to the California Environmental Quality Act ("CEQA"), CEQA Guidelines, and any other applicable laws, ordinances and regulations.

SECTION 7. URGENCY MEASURE

It is hereby declared this Ordinance is necessary as an urgency measure for the preservation of the public health, safety, and welfare. The City Council finds that the current zoning regulations and land use plans relating to logistics businesses do not adequately protect the peace, health, safety and general welfare of the residents of the City or in communities around the City. The City Council finds the urgency measure is necessary in order to ensure adequate regulation of logistics businesses, which regulations will serve to adequately and appropriately balance the rights of existing property owners and future applicants who wish to propose new logistics businesses in the City, with the preservation of the public health, safety, and welfare of the surrounding communities. The facts constituting the urgency are:

- A. Establishment, expansion, or modification of logistics businesses may create immediate irreversible and costly adverse impacts in the community; to wit, road damage, noise, vibration, and pollution. The City's limited budget does not cover the cost of mitigating such impacts. The impacts are already dire for the City, and would worsen and become less manageable with every new logistics facility that begins or expands its operation in the City of Carson. The City cannot afford to continue to impose such impacts onto its budget and onto its citizens and cannot allow these impacts to accumulate any further while the General Plan and zoning code are updated.
- B. It is now essential to determine the development capacity of the zoning districts in the City where such businesses are currently permitted, in light of the capabilities of those districts' infrastructure and public services.
- C. Through analysis of the impacts currently imposed by the current amount of truck traffic generated by logistics facilities, traffic studies to determine ways in which to minimize truck traffic impacts, analysis of appropriate measures to regulate hazardous materials within the City, and measures that the City can take to mitigate or prevent impacts from logistics facilities altogether.
- D. Absent the adoption of this Ordinance, the establishment, expansion, or modification of logistics businesses could result in the negative and harmful secondary effects identified above.
- E. As a result of the negative and harmful secondary effects associated with the establishment, expansion, or modification of logistics businesses, the current and immediate threat these businesses pose to the public health, safety, and welfare, and the potential zoning conflicts that would be created by such development, it is necessary to adopt a temporary, forty-five (45) day moratorium on the establishment, expansion, or modification of logistics businesses in the City.
- F. A moratorium is necessary in order to protect the City and its residents, businesses and visitors from the potential health and safety impacts of logistics businesses, including air quality, noise, traffic, parking, and other impacts, and to preserve the quality of life and protect the health, safety, and welfare of the surrounding communities.

- G. A moratorium is immediately required to preserve the public health, safety, and welfare and should be adopted immediately as an urgency ordinance, to make certain that permits for logistics businesses are issued only under adequate regulations and consistent with the City's future goals for development and expansion. Imposition of a moratorium will allow the City sufficient time to conclude the preparation of comprehensive studies and plans for the regulation of such activities. The absence of this Ordinance would allow the proliferation of such businesses and their undesirable secondary impacts, and create a serious threat to the orderly and effective implementation of any amendments to the General Plan and the Zoning Code, as well as the vision for the City going forward, contemplated by the City Council.

SECTION 8. SEVERABILITY

The City Council hereby declares, if any provision, section, subsection, paragraph, sentence, phrase or word of this ordinance is rendered or declared invalid or unconstitutional by any final action in a court of competent jurisdiction or by reason of any preemptive legislation, then the City Council would have independently adopted the remaining provisions, sections, subsections, paragraphs, sentences, phrases or words of this ordinance and as such they shall remain in full force and effect.

SECTION 9. CEQA COMPLIANCE

Pursuant to Section 15001 of the California Environmental Quality Act ("CEQA") Guidelines, this interim urgency ordinance is exempt from CEQA based on the following:

- (a) This ordinance is not a project within the meaning of CEQA Section, either directly or indirectly. 15378 because it has no potential for resulting in physical change to the environment
- (b) This ordinance is also exempt pursuant to CEQA Section 15061(b)(3) since the proposed ordinance involves an interim urgency ordinance establishing a 45-day temporary moratorium on new development in six planning study areas and does not have the potential to significantly impact the environment.

SECTION 10. PUBLICATION

The City Clerk shall certify as to the passage and adoption of this Interim Urgency Ordinance and shall cause the same to be published in a manner prescribed by law.

SECTION 11. EFFECTIVENESS OF ORDINANCE.

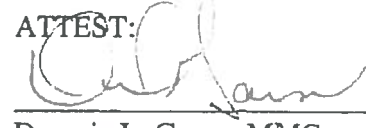
This Ordinance shall take effect immediately, pursuant to the authority conferred upon the City Council by Government Code Section 36937. This Ordinance shall be of no further force and effect forty-five (45) days following the date of its adoption unless extended in accordance with the provisions set forth in Government Code Section 65858. Not later than ten (10) days prior to the expiration of this interim urgency ordinance, the City Council shall issue a written report as required by applicable state law.

PASSED, APPROVED and ADOPTED as an URGENCY ORDINANCE this 21st day of March, 2017.

APPROVED AS TO FORM


Sunny Soltani, City Attorney


Albert Robles, Mayor

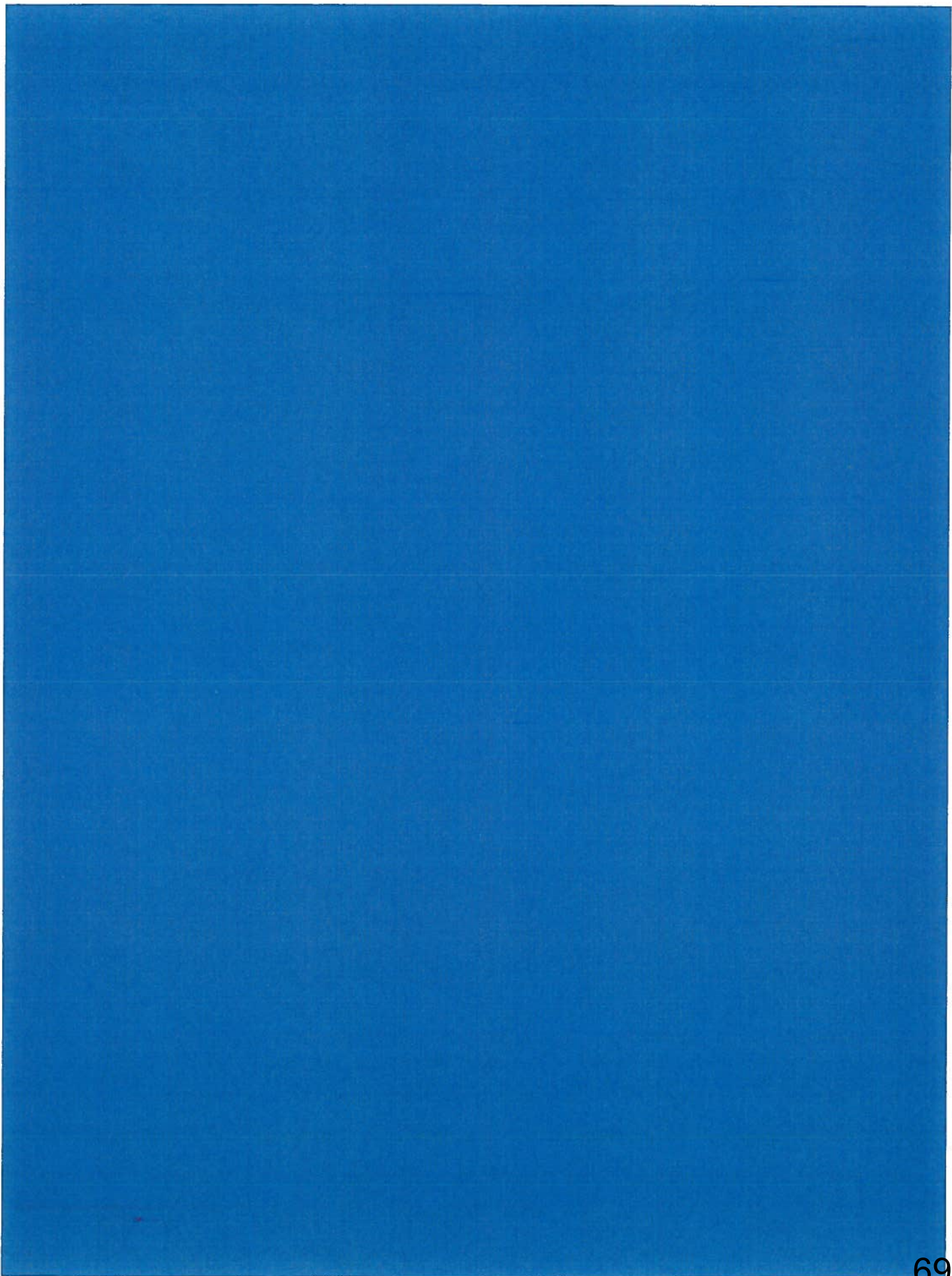
ATTEST:

Donesia L. Gause, MMC
City Clerk

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.
CITY OF CARSON)

I, Donesia L. Gause, City Clerk of the City of Carson, California, hereby attest to and certify that the foregoing ordinance, being Ordinance No. 17-1615U, adopted by the Carson City Council at its meeting held on the 21st day of March, 2017, by the following vote:

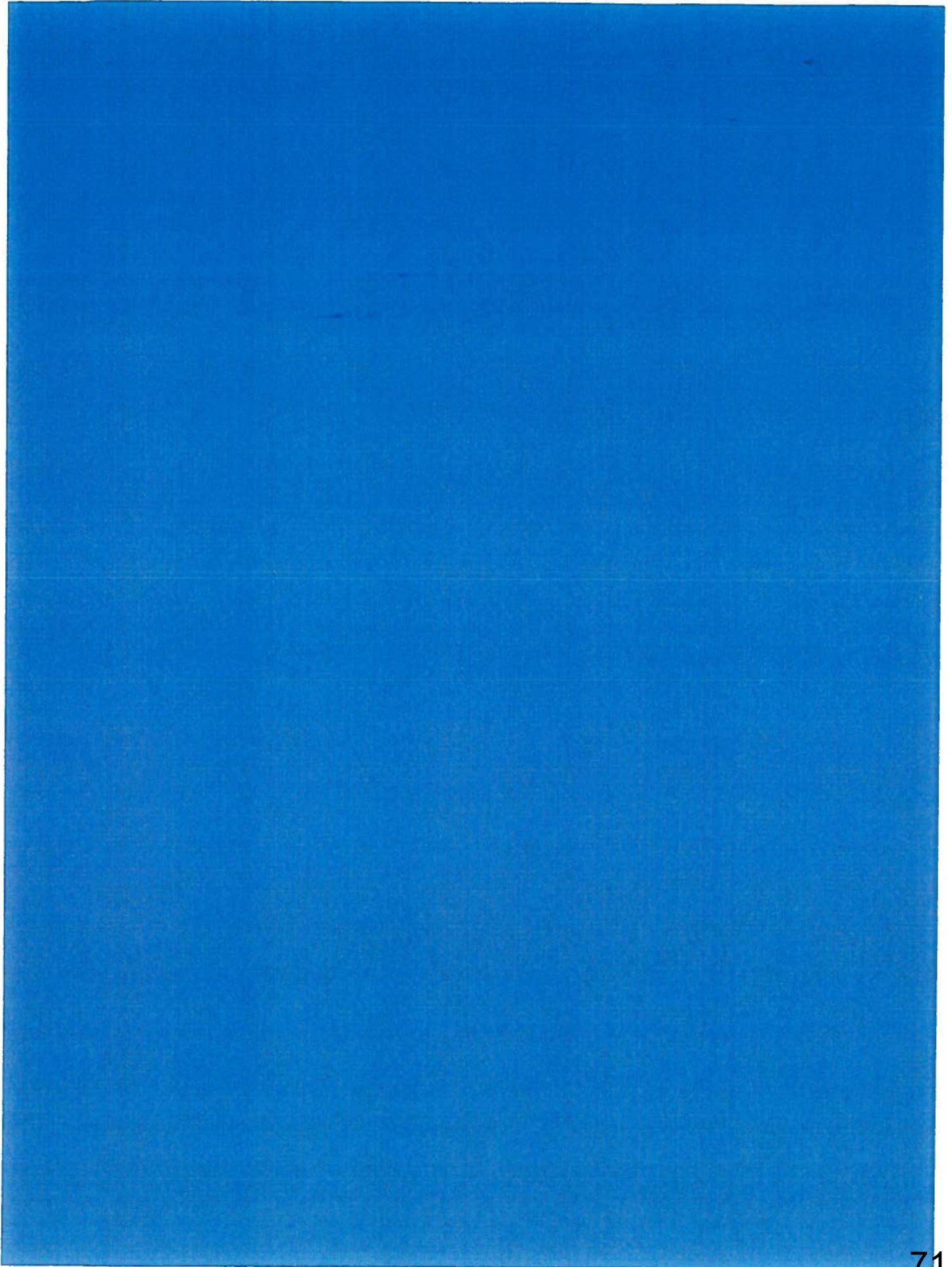
AYES:	COUNCIL MEMBERS:	Robles, Davis-Holmes, Santarina, Hicks, Hilton
NOES:	COUNCIL MEMBERS:	None
ABSTAIN:	COUNCIL MEMBERS:	None
ABSENT:	COUNCIL MEMBERS:	None


Donesia L. Gause, MMC, City Clerk
City of Carson, California



Logistics Moratorium Meeting Dates

Ad Hoc Committee Logistics Moratorium	Lease Provisions (and other overlooked issues)	Land Use and Environmental Issues	Truck Routes/Sheriff's Department	Road Maintenance and Economic Impacts/Benefits
March 28, 2017	April 6th	April 6th	April 10th	April 18 th (tentative)
April 4, 2017	April 17th	April 17th		
April 11, 2017				
April 25, 2017				



MINUTES
CARSON AD HOC COMMITTEE MEETING
LOGISTICS MORATORIUM, MARCH 28, 2017
9:05 A.M. – 11:54 A.M.

Seated:

Mayor Robles, Councilmember Santarina, City Manager Farfsing, Planning Manager Naaseh, City Attorney Soltani, Planning Commission Chair Diaz, Planning Commission Vice-Chair Pimentel, Economic Development Commission Chair Aldridge, Economic Development Commission Vice-Chair Hoyos, Environmental Commission Chair Salazar, Environmental Commissioner Young, Peter Herzog-NAIOP SoCal (Commercial Real Estate Development Association), Alex Cherin (California Trucking Association-CTA), Francisco Franco (Franco Trucking)

Mayor Robles explained why City Council adopted Interim Urgency Ordinance No. 17-1615U, "Implementing a 45-day temporary moratorium on the establishment, expansion, or modification of truck yards, logistics facilities, hazardous materials or waste facilities, container storage, and container parking in the city of Carson"; noted that currently, there is no mechanism in place to cite a truck driver for driving off an approved truck route; and stated the moratorium gives the City a pause, an opportunity to evaluate/assess the problems it is experiencing.

Alex Cherin, representing California Trucking Association (CTA), noted he is sitting in for Weston LaBar; and expressed concern that industry representatives were not engaged from the beginning of this moratorium process. He stated that this industry promotes best practices; that it works with various statewide agencies, such as the CHP, regional planning agencies, AQMD, etc., making sure the trucking industry is aware of and following regulations; and noted they also don't want to see errant truck drivers traveling on restricted roadways. He added that the industry has roadway experts who should also be involved in this process, expressing his belief there should be up to 6 industry representatives sitting on this panel.

Peter Herzog, representing NAIOP SoCal, echoed Mr. Cherin's concerns, stating there also needs to be a variety of representation from the real estate community.

Mayor Robles directed Mr. Cherin to provide those individuals' names to staff, believing the size of this Committee may increase.

George Boyle, Quikpick Express, agreed with those comments, suggesting at a minimum, Alex Cherin, Weston LaBar, and Loren Miles be on this Committee.

Mr. Herzog asked the City to define the specific issues of concern and to identify the truck routes.

Mayor Robles stated that the issues of concern are varied, and expressed his belief that in order to keep things manageable, the Committee should not be comprised of too many members; and he directed that after this morning's break, the industry nominate two industry representatives to be seated on this Committee.

Mark Armbruster, attorney representing Cypress Land Company, expressed his belief the City is overreaching its authority with the lease provisions in the moratorium, stating the City is not permitted to regulate leases; and advised that this could be considered a regulatory taking and would expose the City to potential lawsuits, noting the lease provisions/language should be immediately removed from the moratorium.

Mr. Herzog pointed out that the lease concerns are critical; that the language directly/immediately impacts business activity, noting that business cannot be paused until the City makes its decision; and pointed out that leases are negotiated and renewed on a daily basis.

Mayor Robles highlighted one tenant who moved into a warehouse in Carson without first obtaining a business license and a conditional use permit, a business that is receiving/storing/shipping hazardous materials within close proximity to a school, park, and residential area; and advised that today, this moratorium would prevent such a tenant from moving into this community without the landlord first advising the City of what type of tenant will be leasing a facility in Carson. He expressed his belief that this moratorium is about creating solutions to issues of concern for this City.

Mr. Armbruster stated that the City should be fully utilizing its code enforcement personnel to deal with that situation.

Mr. Herzog stated there are various ways to deal with a problem tenant, pointing out that the City should not be creating a blanket moratorium that affects the entire logistics community.

City Attorney Soltani stated that mentioning this one tenant was only an illustration of a larger problem in this City; and explained that the City's codes were drafted many years ago and that those codes need to be updated to be reflective of the changing times and the challenges the City has been experiencing for many years. She added that this moratorium creates a pause that will allow all interested parties to come together to create solutions that benefit not only the City and its residents but also the logistics

community. She asked what are the typical lease terms for this industry, typical lease costs, and typical length of time a tenant stays.

Chuck Littell, Colliers International, pointed out that he has made lease deals in as little as 2-30 days and that a 45-day delay would be very damaging for this industry. He advised that a typical lease in the marketplace is anywhere from 5 to 10 years, noting the average would be 7 years; and explained that the cost of a lease depends on the condition of a building, its age, location, market demand, but stated that a 100,000-square-foot warehouse can range from \$5-\$10 a foot, again, depending on the needed upgrades. He stated that the time a tenant typically stays is also dependent on various factors, but noted a minimum stay would be 5 years. With regard to the comments related to the example used for the problem tenant in Carson, he stated that is a code enforcement issue.

Mayor Robles stated that the City is asking the landlords to let the City know who they are leasing to and what type of business will be in the warehouses, pointing out that they will be considering exemptions/exceptions to this moratorium; and stated that currently, the City's codes don't require landlords to report what type of business they are leasing to in their buildings. He added that residents have inquired as to what type of business is inside a building close to their child's school or home, but noted that the City currently is not able to provide that information to that resident.

Mr. Littell stated that his clients are concerned with poor road conditions and that the industry does want to help improve the roadways.

Mr. Herzog reiterated that because of one tenant, the City should not be blanketing the industry with this moratorium; encouraged the City to utilize its code enforcement personnel to the full extent; and pointed out that this industry employs thousands.

Mr. Littell urged the City to eliminate as many unknowns as possible, stating there are too many time-sensitive issues in this industry that are impacted by this moratorium.

Mayor Robles reiterated the opportunity to apply for an exemption/exception.

Mr. Littell stated that having to go through the process of applying for an exemption/exception will cause delays and potential loss of earnings, especially when businesses are competing for clients.

Brian Harvey, Cypress Land Company, expressed his belief the City has no business trying to regulate leasing activity, stating it is illegal and is subjecting the City to tremendous liability.

Rick Pulido, resident, stated that the City shouldn't cower to the threat of lawsuits; that the City needs this industry to pay its fair share to the damage it is doing to the

roadways and to the environment; stated that the Sheriff's Department should be pulling over and ticketing errant truck drivers; that the City should be charging warehouse taxes; that there should be surcharges on trucks and containers; and that the City should be monitoring the trucking corridors for health impacts resulting from this industry. He added that this industry should be paying for the planting of trees along these corridors to improve the air quality; and stated that this moratorium should have an extension beyond the 45-day period.

Mr. Cherin asked if the City's intent with this moratorium is to use the existing municipal code as a starting point, to present new ideas, or to use this as a code enforcement exercise.

Mayor Robles stated all options are on the table.

City Attorney Soltani stated that this provides an opportunity to study the code and come up with ideas that will be beneficial to all.

Planning Manager Naaseh advised that the City is currently in the process of updating its General Plan and Zoning Codes, noting they are decades old and are in need of comprehensive updates.

Economic Development Commission Vice-Chair Hoyos, Watson Land Company, asked how long will the General Plan and Zoning Code updates take. (This is an approximate 2-year process.)

The meeting was recessed at 10:15 a.m. and reconvened at 10:28 a.m.

Per Mayor Robles' direction, the industry representatives selected the following industry representatives to serve on this Committee: Peter Herzog, Weston LaBar, Alex Cherin, Francisco Franco.

Cameron Smith, Yusen Logistics, stated that code enforcement, the Fire Department and other regulatory agencies routinely visit his business site to make sure they are following regulations; stated that they are expanding and that they support many large customers who rely on a smooth operation; advised that they employ approximately 1,500 people; and that they want to work with the City, but stated that this is not the core of all the City's problems. He expressed his belief this moratorium overreaches its authority within this business community.

George Boyle, Quikpick Express, expressed his belief this industry is committed to working with the City, but stated that the moratorium is far-reaching and should be narrowed in its scope.

Mr. Cherin concurred with Mr. Boyle's comments, suggesting the industry identify its top 3 issues of concern, such as routes, weight.

Planning Commission Chair Diaz expressed his belief there should be no limit in addressing issues of concern to the City.

Mayor Robles stated he would support the industry identifying a number of its top concerns.

Eric Preston, Fed Ex representative, stated that this moratorium has the potential to negatively impact their business operations.

Loretta Thompson, Fed Ex attorney, stated that Fed Ex partners with the cities in which it does business and that they want to be involved with this process; pointed out that Fed Ex routinely abides by the established regulations; and pointed out that Fed Ex guarantees delivery, urging the City to not put something in place that will impede its 24/7 operations.

Daniel Alvarado, representing Inland Star, advised that they only receive, store, and ship materials that are strictly regulated by the state, no mixing of materials; and advised that their Carson facility is state-of-the-art and that they are a responsible warehouse operator with years of experience in this industry. He stated that they regret not pulling the proper permits, but added that they are working closely with the City and Fire Department to resolve these issues of concern. He expressed his belief there have been mischaracterizations of this company; and he noted that their entire warehouse is open to agency inspections.

Mayor Robles mentioned that Inland Star is not the only reason for this moratorium.

City Attorney Soltani mentioned that they have been very careful not to mention the name of the company that had not pulled the proper permits and its storage of hazardous materials, pointing out that Mr. Alvarado has now divulged this information; and she stated that the City is working with this company through the process. She echoed the comment that this moratorium is not just about the problems with this company.

Councilmember Santarina asked why a statement has been made that the moratorium is not balanced.

Mr. Herzog explained that staff report and the ordinance indicates the "logistics" industry is bad; that it cites roadway damage from loaded mining trucks on the street – pointing out there are no mining operations in this city; and expressed his belief that this city is experiencing some of its problems because of deferred street maintenance and budget problems. He stated that the logistics industry has paid its fair share; pointed out that

the trucks now run cleaner with improved efficiency, that their technology is improving; and he mentioned that this industry creates one-third of the state's economy.

John Schumacher, CBRE, stated that his company has negotiated between 500-600 leases in Carson; expressed his belief the impacts of the moratorium haven't been fully vetted; and cited a recent incident in which a tenant was ready to execute final documents to lease a large building in Carson but ended up going to Torrance as a result of this moratorium – pointing out the client would have employed many from this community. He stated that quality tenants typically stay longer than 3 years in a lease and that short-term leases typically equates to poor tenants.

City Attorney Soltani reiterated that the industry can apply for an exemption/exception; advised that staff is currently drafting a letter describing the process, noting there are currently 6 applications for exemptions. She explained that regulations do change and that the City is trying to make this as business-friendly as possible; and that filing for an exemption/exception is just one extra step to take.

Mr. Schumacher advised that there are situations where businesses won't wait, as in the case he cited; and he asked if the City is committed to ending this moratorium in 38 days.

Mayor Robles encouraged the business community to do its part in identifying the top issues of concern and how to solve those problems, submitting those lists by 8:00 a.m. this Thursday; stated that this can be expedited as long as everyone provides the requested information in a timely manner; and he stated that this Committee will meet again next Tuesday at 9:00 a.m.

Mr. Schumacher expressed his concern with the 3-year lease provision, noting that 15-year leases are preferable; and stated that more bureaucracy is not needed.

Mr. Herzog expressed his concern with the exceptions language in the ordinance, highlighting the 30- and 90-day window, and pointed out that City Council is not required to approve exception applications. He stated that a 30-day window is too long in the lease business and that it creates uncertainty in negotiating leases.

Economic Development Commission Vice-Chair Hoyos stated that the lease issue is of great concern, pointing out that even a 1-day delay has caused a potential Carson business to locate to Torrance; advised that Watson Land Company has not yet received a response in regard to a letter they submitted addressing concern with the vesting language; and she stated that the lease language should be deleted, that it is not necessary and places the City in a precarious legal position. She stated this has the potential for loss of jobs and business; and requested that the vesting language be precisely clarified/defined.

Mr. Armbruster highlighted the language in Section 6, Exceptions, "the proposed new use or new tenant will not be in conflict with the contemplated General Plan update, any specific plan or zoning code update that the City Council is considering or studying or intends to study," stating that section is vague and needs specificity.

Mayor Robles reiterated that the industry should submit to the City their top issues of concerns, how they propose to solve those issues of concern, whether they wish to be part of the solutions, and whether issues addressed in the moratorium should not be included. He added that this should be submitted to the City by 8:00 a.m. this Thursday, which will give staff time to review and address the comments at the next meeting on Tuesday at 9:00 a.m.

Environmental Commission Chair Salazar stated that packages now require clear identification of any harmful substances enclosed; urged the City not to duplicate this standard, therefore wasting time/effort; encouraged the City to fully put in force its code enforcement rights; and stated he is not supportive of a blanket moratorium, believing it is harmful to the industry.

Economic Development Commission Chair Aldridge stated that hiring more code enforcement staff would be helpful.

Economic Development Commission Vice-Chair Hoyos stated that many of these business leaders have moved this City from junkyard status to a thriving business community; expressed her belief this moratorium has sent a negative message to the current and potential business community and has long-term negative impacts; and pointed out that the City's finances are in a precarious state and stated that if this City continues to spend as it has been, it will likely go bankrupt in the next 3 years. She asked what are the revenues generated by this industry; and stated that all parties need to work together for a quick solution, expressing her understanding this is not just a 45-day moratorium, but a long-range moratorium in the making. She stated that the moratorium needs to be immediately modified.

Planning Commission Vice-Chair Pimentel stated that the letter explaining the process for exemptions/exceptions needs to be immediately given to the business community.

Planning Commission Chair Diaz pointed out that these businesses are here because of the nearby twin ports; and noted his empathy for the business industry, but also empathy for the residents who have to live with the impacts from this industry. He stated that resolution of these concerns should be expedited.

Environmental Commissioner Young briefly referred to the short-term and long-term financial impacts to the business community.

Mr. Franco urged everyone to work toward solutions.

Mr. Cherin stated that they will be identifying their list of concerns by Thursday.

Planning Manager Naaseh advised that information regarding the moratorium has been placed on the City's website.

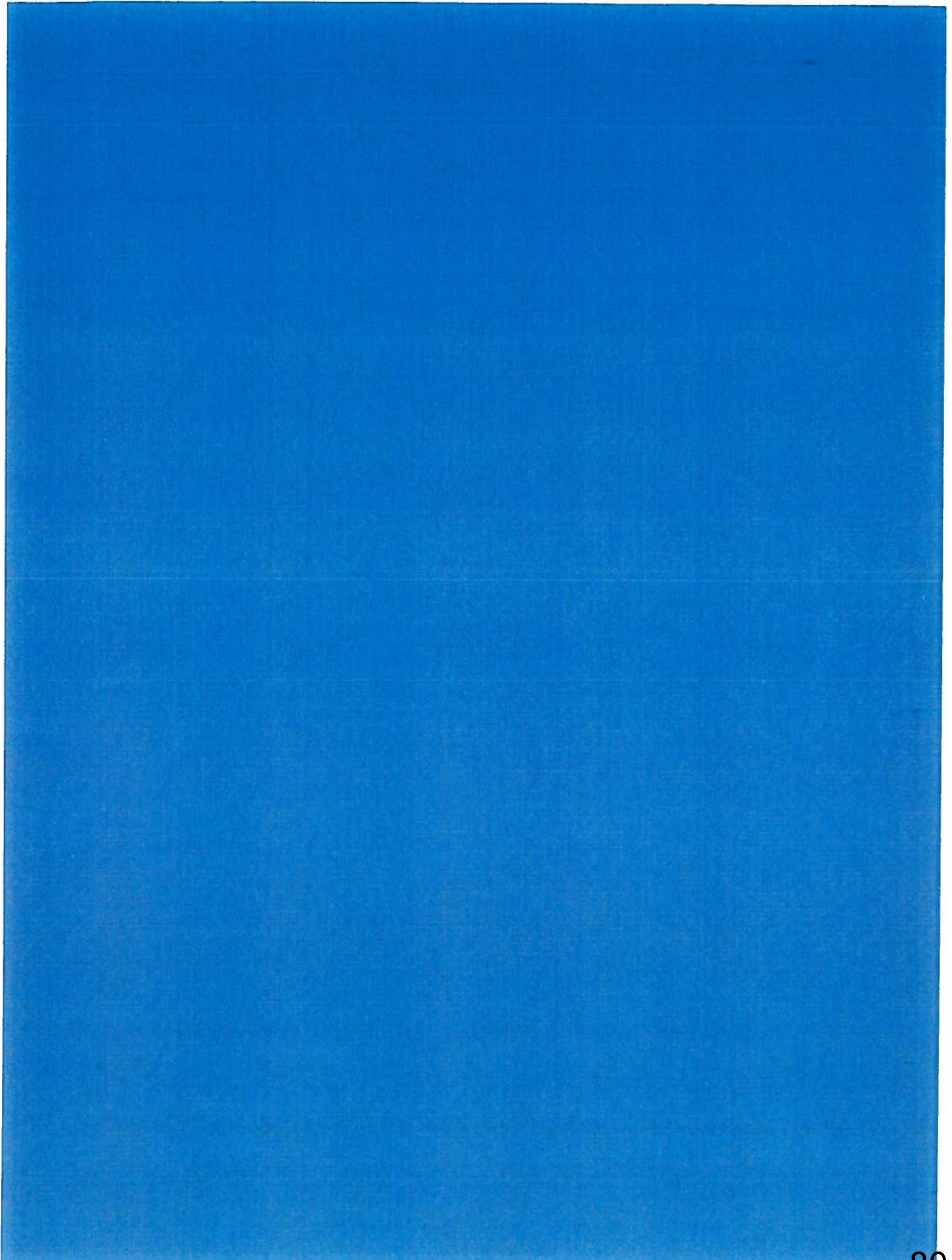
John Low, Prologis representative, noted the need for road repairs, and he questioned what formula the City is using to collect Development Impact Fees (DIF).

Loren Miles explained that this moratorium creates some misunderstanding within the industry, expressing his belief there is a disconnect between the City and the industry on how business works; stated that this moratorium creates a perception within the industry that Carson is not an ideal market within which to invest; he questioned whether Carson really wants this resolved in 45 days; and stated that an average General Plan Update takes 2-3 years to complete, pointing out it is not acceptable for this process to go on for 2-3 years. He expressed his belief this moratorium is not valid, as there is no imminent risk to the health, safety and well-being of the public. He stated that the City Council and the Planning Department should have prioritized the needed Zoning and General Plan updates years ago; and noted that the industry is committed to resolving this issue quickly, but questioned if the City is committed to resolving this issue quickly. He asked if the City is committed to using infrastructure improvement moneys as earmarked; suggested that an 800 number be established to report errant truck drivers; pointed out that the state highly regulates toxic substance transport/storage; and he suggested that the City inspect the warehouses located near schools and residential areas if there is concern with those facilities.

The meeting adjourned at 11:54 a.m.

Subcommittee Chair

Secretary



Saied Naaseh
Planning Manager
City of Carson
701 E Carson Street, CA 90745

RE: Ad-Hoc Committee Industry Members Responses

Dear Mr. Naaseh,

On behalf of the industry participants of the recently convened ad-hoc committee to address concerns raised by city staff regarding trucking, warehousing, logistics, and hazardous waste industries in the city, we would like to submit this response. First, it is important to acknowledge our ongoing opposition for what we believe is an unnecessary and flawed moratorium on the aforementioned industries in the City of Carson. There are serious concerns with the process to enact this moratorium, as well as the flawed staff report and legal analysis by the city. We continue to believe the information set forth regarding the ordinance does not warrant the need for a moratorium. However, in a good faith effort we are hoping to work collaboratively with the city to address concerns and end this moratorium after the 45-day period.

As participants in this process, we submit the following:

1. We request the city immediately strike the lease provisions of the moratorium and allow for property owners and tenants to adequately work together to negotiate leases.
2. To not extend the moratorium past the 45-day period.

We would also like to respond to the following:

1. In response to the comment that the city has no ability to enforce vehicle code violations against trucks, we have confirmed this is false. The County Sheriff's Office not only has the ability to enforce vehicle code violations regarding trucks, but actively cite truckers violating any vehicle code that is applicable. We encourage the Sheriff's Department to continue to do so, including enforcing the already established truck routes.
2. In response to the comment that the city has no ability to enforce situations regarding housing of hazardous material, we have confirmed this to be false. The city already has enforcement ability against any tenant that does not have the necessary permits to conduct operations on a facility. The City and the one business that has been mentioned have indicated a process is currently underway to correct that situation. Furthermore, the entire issue surrounding hazardous materials is fully regulated by Federal and State laws. Thus, any concerns regarding any violations can be referred to the appropriate enforcement agency, such as the State Department of Toxic Substance Control.

We are in the process of a full and thorough review of the urgency ordinance's supporting documentation. It is also important to point out the need for a fair and reasonable amount of time to review and respond to the complete ordinance. It is also our opinion that the city has not

conveyed the true intent on the desired issues and resulting wish list from the city, which makes it difficult to provide any suggested solutions.

From a high-level initial review, we would suggest a comprehensive review of existing city ordinances including:

- Review of the city's existing truck routes
- Review of existing policy on hours of operations for different facilities
- Review of the city's fiscal practices including revenues and expenditures – specifically focusing on street maintenance for the past 5 to 10 years
- Review of the city's code enforcement practices/city prosecutor actions
- Review of city's business license process

We also believe it would be in the city's best interest to familiarize itself with the existing regulations from the United States Department of Transportation, Federal Motor Carriers Safety Administration, California Transportation Authority and others on the trucking industry specifically the port trucking sector. Furthermore, a review and understanding of environmental regulations on trucking and warehousing enacted by the United States Environmental Protection Agency, California Air Resources Board, South Coast Air Quality Management District, and the Clean Air Action Plans administered by the Ports of Los Angeles and Long Beach are necessary to understand the existing regulatory standards already in place.

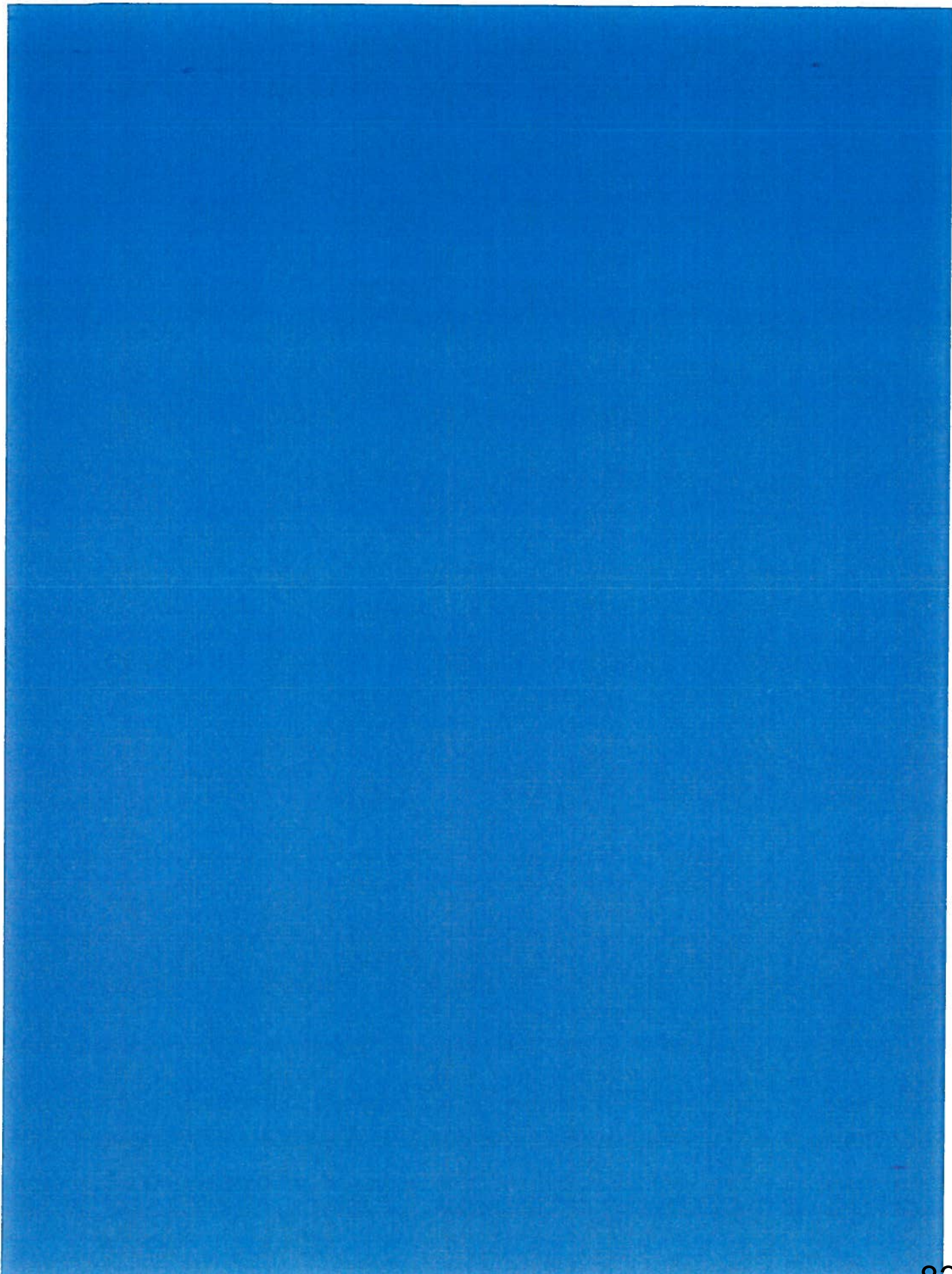
It is the belief of this committee that enforcement of existing local, regional, state, and federal regulations should satisfy the concerns laid out by the city's staff report and do not warrant this moratorium, or an extension to it.

Industry partners are exploring undertaking an economic impact analysis to determine direct and indirect benefits to the city, such as jobs and revenue from logistics and trucking sector.

We look forward to working with the city through this process and ongoing following the end of the moratorium. Please let us know if you have any questions.

Sincerely,

Alex Cherin
Francisco Franco
Peter Herzog
Weston LaBar





CARSON ESTATE TRUST
CARSON DOMINGUEZ PROPERTIES, L.P.
CARSON ENERGY LLC
www.carsoncompanies.com

March 29, 2017

Mr. Saied Naaseh
Planning Manager
City of Carson
701 E. Carson Street
Carson, CA 90745

Via electronic mail: snaaseh@carson.ca.us

RE: Ad-Hoc Committee Response to the Mayor's Request

Dear Mr. Naaseh,

At yesterday's Ad-Hoc Committee meeting regarding the recently adopted 45-day temporary moratorium, the Mayor requested industry participants submit written correspondence with concerns and proposed solutions to the issues addressed in the moratorium. This letter is an attempt to respond to the Mayor's request.

Issue #1 The Moratorium

The Moratorium is greatly flawed and is exposing the City to significant legal cost and dilution of the City staff's time and efforts. The vast majority of the City's concerns can and should be resolved by enforcement of the existing rules and regulations of the City including enforcement of:

- Current Zoning Laws
- Inspection and Sign-off on All Permitted Building and Tenant Improvement Work
- Enforcement of Business Licenses
- Enforcement of Truck Routes
- Inspection of facilities by the Fire Department.

To our knowledge, nothing prevents the City from enforcing its current regulations. Further, we believe that all of our facilities have been appropriately inspected.

LETTERS/ CITY OF CARSON - SAIED NAASEH - MORITORIUM.doc

CORPORATE OFFICE
100 Bayview Circle, Suite 3500
Newport Beach California 92660
949/725-6500 FAX 949/725-6550

RANCHO DOMINGUEZ OFFICE
18710 S. Wilmington Avenue, Suite 200
Rancho Dominguez, California 90220
FAX 310/884-5932

TEXAS OFFICE
9821 Katy Freeway, Suite 440
Houston, Texas 77024
713/360-7934 FAX 713/360-7952

Solution:

Do not renew the 45-day moratorium and enforce current regulations. As owners of approximately 3 million square feet of industrial property in the City of Carson, we are inspected often by the Fire Department as well as City personnel on building and tenant improvement work.

Issue #2 Road Maintenance

The City claims it is unable to maintain its roads due to budget constraints and deterioration created by truck traffic. Note that trucks service not only the logistics facilities but also all of the retail, automotive dealerships, gas stations, post offices, City yards, etc. It seems completely inappropriate to only enforce the moratorium against logistics facilities.

Solution:

The City needs to get its finances in order and to review every line item of its budget including; Pension Obligations, Services, Legal Fees paid to the City Attorney, etc.

In 2016, we paid more than \$3 million in real estate taxes for property owned in the City of Carson. We and our tenants use very little City services. We use NO school services, very little public safety and Fire. To say we do not pay our fair share is totally inaccurate and unfair.

Issue #3 Tenant Improvements on Vacant Space and/or Leases or Lease Extensions Greater than 3-Years Requires City Council Approval

These requirements are duplicative and put a tremendous burden (and cost) on the City staff as well as the business community. Any material tenant improvements (whether for a new tenant or existing tenant) are already reviewed, approved, permitted and inspected by the City.

The requirement that any new lease longer than 3 years (of which most leases are longer than 3 years) will require City Council approval and will take 1-3 months to process is ridiculous. You already approve the business licenses, tenant improvements and you have enforcement rights over zoning, storage of hazardous substances, truck routes, etc.

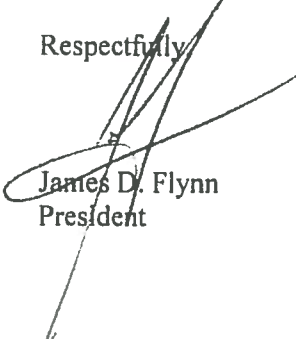
You state that there are 50 million square feet in the City of Carson. If every lease is 30,000 s.f. and 5 years in term, you will need to approve 20-30 leases per month. Does the City Council really have the time and expertise (with all the other City issues) to competently accomplish this task?

Solution:

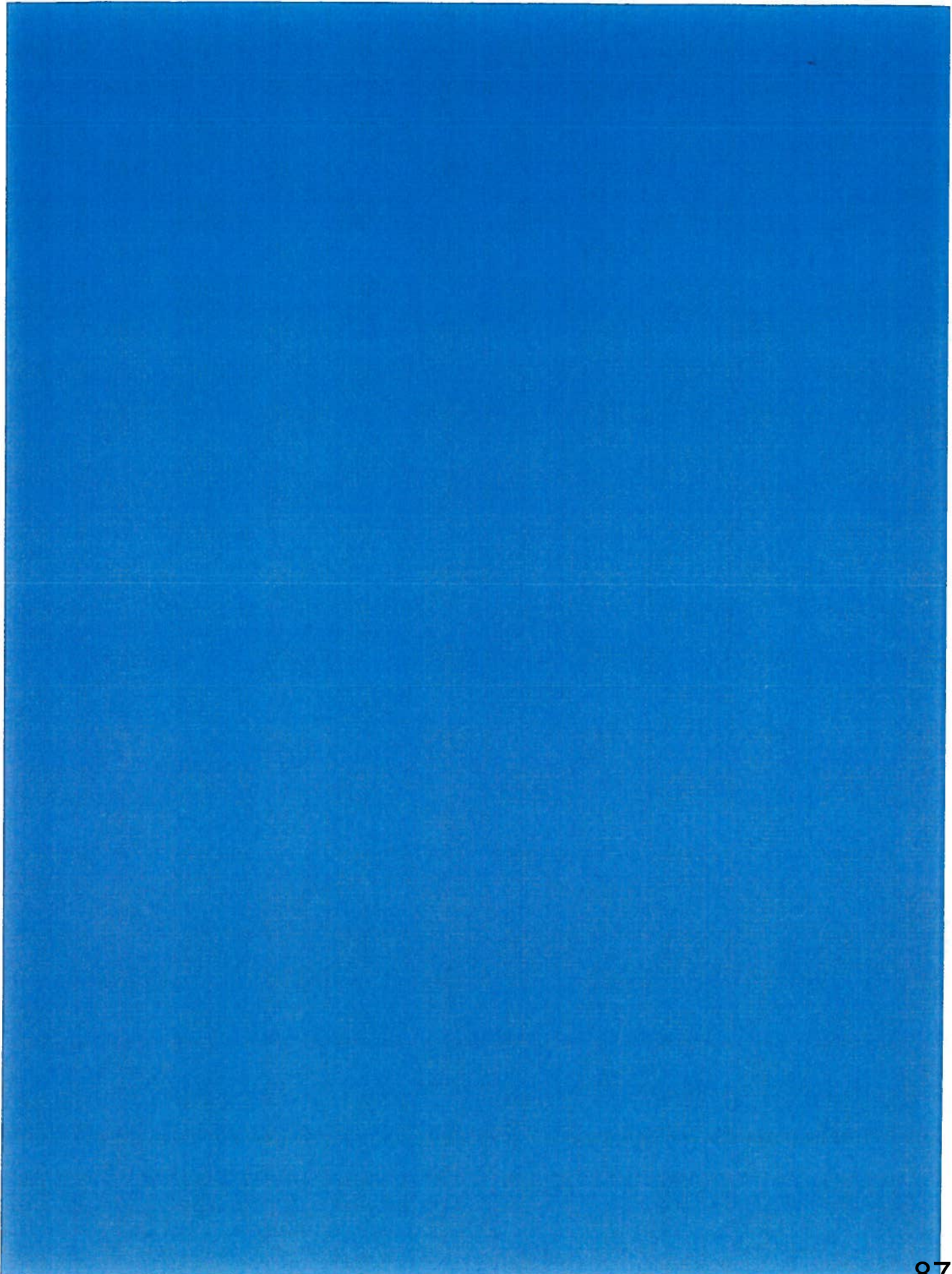
Eliminate these requirements from the ordinance or any extension thereof.

We remain interested in working with the City to improve and solve the issues the City has identified but the vast majority of these issues can be resolved by enforcing the current rules and regulations already under the City's control.

Respectfully,



James D. Flynn
President



MINUTES
CARSON AD HOC COMMITTEE MEETING
LOGISTICS MORATORIUM, APRIL 4, 2017
9:10 A.M. – 11:06 A.M.

Mayor Robles advised that only two letters were submitted, one letter being signed by a few business representatives; and he mentioned that a copy of those letters, the minutes from the March 28th Ad Hoc Committee meeting, and the exemption/exception letter are all available for distribution at this meeting. He welcomed the industry's input/proposals to help the City through this process; stated that those comments will be taken into consideration; and he urged the business community to put those comments in writing and submit those to Planning Manager Saied Naaseh in the Planning Department.

City Attorney Soltani pointed out that because this is a public agency, all correspondence will be a matter of public record; explained that the City is looking at its regulations and is trying to come up with ideas that will strengthen those regulations; and she encouraged the public to participate in this process.

Mayor Robles proposed establishing the following four subcommittees to focus in on those areas of concern, inviting the Committee members to volunteer for any subcommittee:

- 1) Road Maintenance and Economic Impacts/Benefits (Alex Cherin, Francisco Franco, Ray Aldridge, Councilman Santarina, Berwyn Salazar)
- 2) Land Use and Environmental Issues (Weston LaBar, Pilar Hoyos, Ramona Pimentel, Peter Herzog, Councilman Elito Santarina, Berwyn Salazar)
- 3) Truck Routes, Sheriff (Alex Cherin, Ray Aldridge, Louie Diaz, Ramona Pimentel, Councilman Santarina, Sheriff's Captain Jason Skeen)
- 4) Lease Provisions and other issues that may have been overlooked (Mayor Robles, Pilar Hoyos, Weston LaBar, Francisco Franco, Peter Herzog, Ramona Pimentel)

Mayor Robles advised that Sheriff's Captain Jason Skeen was not able to attend today's meeting but that he will be taking part in the Truck Routes/Sheriff subcommittee meetings.

The meeting was recessed at 10:05 a.m. to allow each subcommittee to meet and discuss issues of concern to each subcommittee and to set a date/time to meet. The meeting was reconvened at 10:52 a.m.

Peter Herzog indicated he would be participating in the Lease Provisions and Land Use and Environmental Issues subcommittees.

Mayor Robles advised that the Lease Provisions subcommittee will meet on Thursday, April 6th, from 11:00 a.m. to 1:00 p.m.

Weston LaBar advised that the Land Use and Environmental Issues subcommittee will meet on Thursday, April 6th, from 4:00 p.m. to 6:00 p.m.

Alex Cherin advised that the Truck Routes/Sheriff subcommittee has not yet set a date to meet, noting that Planning Manager Naaseh will contact Sheriff's Captain Skeen on his availability to attend; and advised that the subcommittee has identified four issues they want to address.

Francisco Franco advised that the Road Maintenance and Economic Impacts/Benefits subcommittee has not yet set a date to meet, noting that City Manager Farfsing will be providing a roadway ratings map of the City's streets.

Ray Aldridge stated that because Carson already has regulations/laws in place, the City should be enforcing those codes/laws upon those not following them; stated that if the problem is not enough code enforcement personnel, then the City should be looking at finding the funding to hire more staff; added that more Sheriff's personnel should be assigned to look for truck drivers traveling off approved routes; and stated that a moratorium is not needed if the laws are enforced. He pointed out that going north on Wilmington Avenue between Del Amo Boulevard and Victoria Street is a pothole-ridden roadway that is not in the city of Carson, mentioning that many residents mistakenly believe this roadway belongs to Carson.

City Manager Farfsing advised that he has been in communication with the Los Angeles County Supervisor's Office to address the poor roadway conditions in that area; and advised that just this morning, he received a response indicating the County has already implemented plans to improve those poor roadway conditions in that area. City Manager Farfsing advised that he will continue to follow up with the Los Angeles County Supervisor's Office on those activities.

Pilar Hoyos advised that Watson Land Company has over 100 buildings in Carson that largely provide logistics and port-related services; reiterated their concern that this ordinance is too far-reaching; stated it is unfortunate the way this process has been handled thus far, but added that they are hoping the City will work with the business community in a cooperative manner to identify what the real issues are; added that the issues remain to be discussed or put on the table; and advised that she is talking about use over revenue, stating that the Ad Hoc Committee should address that issue. She echoed the comments about fully utilizing the City's enforcement team; and stated that the City should immediately begin with fully enforcing its laws and determine why these issues of concern are not being enforced.

Ms. Hoyos stated that she will volunteer for the Land Use and Environmental Issues subcommittee, highlighting 24 pages which lists/describes permitted industrial uses in Carson. She volunteered for the Lease Provisions subcommittee, stating this is a critical issue, one that needs a better understanding with the complexity of business issues that this process creates; and stated that the lease provisions should be deleted entirely because it creates a host of negative consequences. She advised that the state has earmarked billions of dollars for road repairs; and she expressed her belief that staff's City Council moratorium report was biased, unfair and unjustified as to blaming all these problems being caused by only one sector of the industry. She entered into the record the state's/League's 2016 California Local Streets and Road Assessments booklet. She noted her appreciation of City Manager

Farfaring mentioning at the February 7th City Council meeting Watson Land Company's hosting of a warehouse tour, which included staff members and commissioners, and his mentioning that it's difficult to define what is in those warehouses because there is a mix of uses, offices, manufacturing; and reiterated her concern with the City making disparaging remarks about the logistics and trucking industry, pointing out this is not the only industry using the City's roads and doing business in Carson.

Weston LaBar stated that the Land Use and Environmental Issues subcommittee discussed looking at Carson's current land use codes relating to the operations that are covered under the moratorium and possible connection with either existing or potential land uses moving forward to make sure everything marries up with one another; addressed issues in and around the moratorium relating to truck parking and impacts to streets and neighborhoods; and addressed environmental assessment with the Ports of L.A. and Long Beach, concessions agreements, truck registries which determine how many of the clean trucks come into Carson and that impact to the environmental analysis, those that meet the new environmental standards versus those that don't.

Alex Cherin reiterated that the position of the California Trucking Association (CTA) is that regulations already exist, both statewide and citywide, noting the subcommittee's desire to address these regulations with Sheriff's Captain Skeen; that the subcommittee will address the department's jurisdiction with respect to being able to cite an errant truck driver; will look at existing truck routes to see if the truck routes need to be updated; will clarify with Captain Skeen issues related to over-weight trucks and other truck condition issues and the department's jurisdiction; and to address training and other mechanisms necessary to allow the Carson Sheriff's Department the authority to cite these truck drivers when necessary.

Weston LaBar stated his subcommittee will be addressing street signage related to trucks and the ability to enforce street signage/violations, truck routes, truck parking; and he added that he would not want to see this moratorium extended beyond this 45-day period.

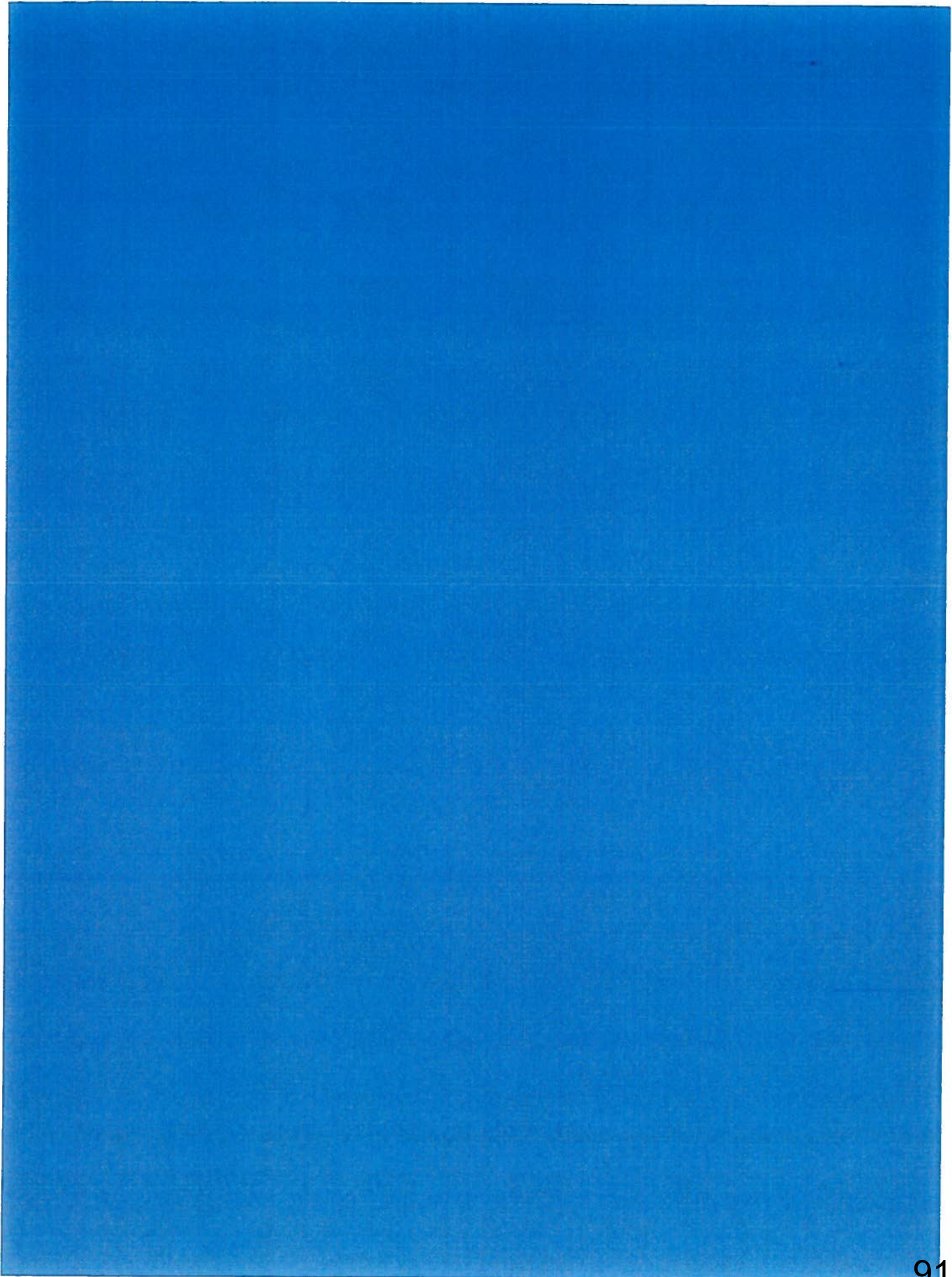
Ray Aldridge stated he is hopeful everyone will work in good faith to solve these issues of concern and that the 45-day period will not be extended.

Ms. Hoyos agreed with Mr. Aldridge's comments, stating that we are all in this together; and urged the City not to have this moratorium create non-intended consequences from a policy decision that may be counter to this moratorium.

Ramona Pimentel stated she hopes this effort will come to a conclusion within this 45-day period.

Mayor Robles thanked the audience members and the subcommittee members for their attendance and participation, stating he is hopeful and optimistic a resolution will be reached where the highest percentage of people will be supportive of the process.

The meeting was adjourned to Tuesday, April 11, 2017, 9:00 a.m., Hall C, Carson Community Center.



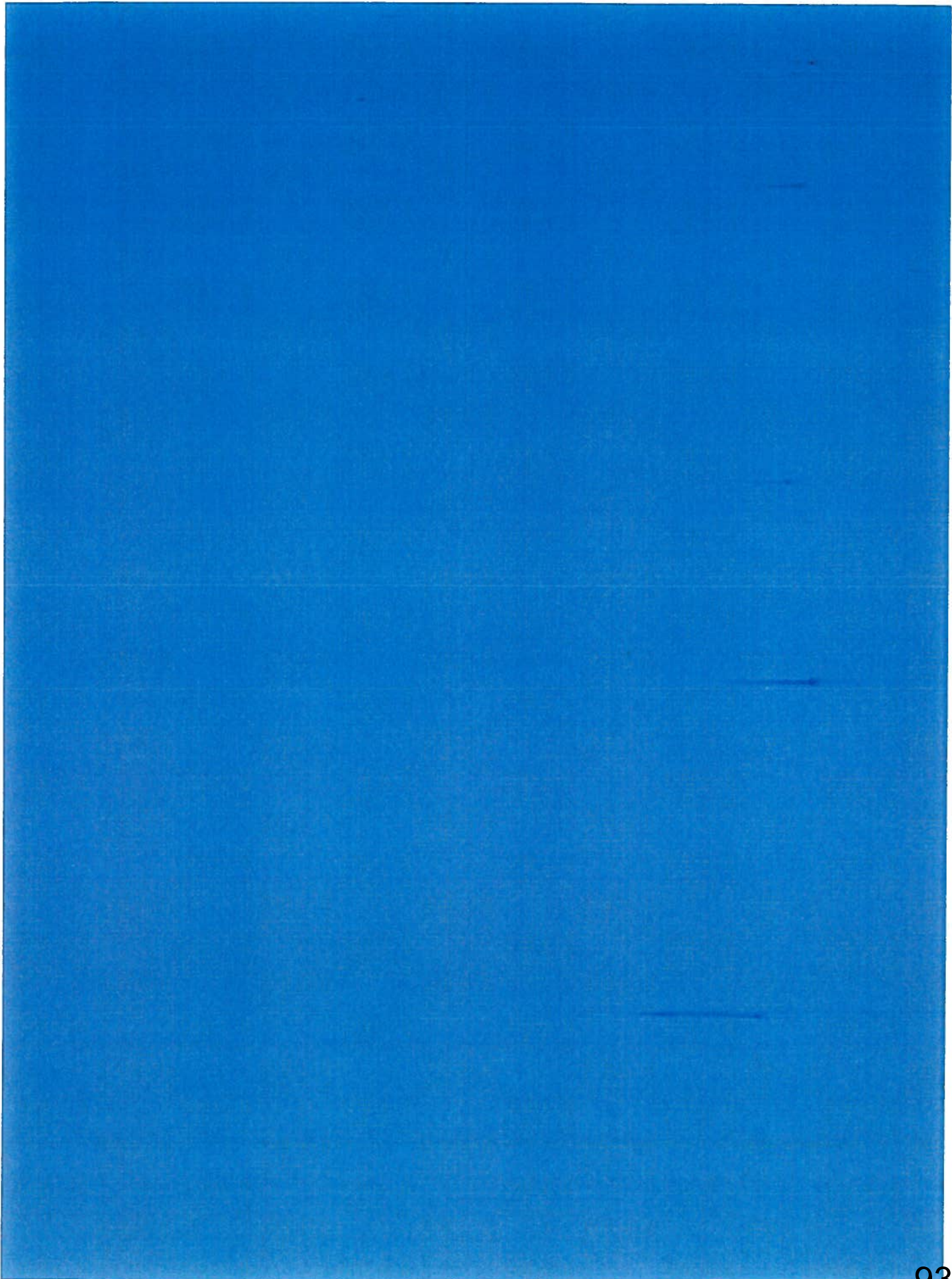
Lease Group

Topic Discussed and Suggestions

1. What is the purpose of the moratorium
2. Need discussion of permitted uses
3. Examine rezoning of the areas
4. Put the 170 sites on the map
5. Limiting the classification of uses for fire department
6. What are the uses City is most concerned about
7. Make sure you require insurance
8. Lease provision should only apply to CUPs only
9. Improve coordination with between fire, building and safety, and planning
10. To stop vibration, the source has to be physically separated from the recipient; however, better road surfaces are the most practical solution.
11. Establish an 800 number for residents and business owners to report illegal activities
12. Identify the classification of hazardous materials that moratorium applies to
13. Three year lease is not consistent with amortization period for equipment
14. Lease extensions should not be subject to the moratorium
15. Moratorium is not warranted and should not apply to existing buildings trying to lease spaces to permitted uses
16. Next meeting Monday 4-17 at 9:00 AM

Main Recommendations:

17. The moratorium should not apply to extension of existing leases and new leases for existing buildings unless otherwise identified below:
 - a. Logistics businesses with storage of hazardous materials (use fire department classifications) should be subject to the moratorium (applies to existing buildings only)
 - b. Logistics businesses next to sensitive uses including residential (committee did not discuss parks and schools but they should be included) should be subject to the moratorium. A map should be prepared to identify the areas of the City which this provision applies (applies to existing buildings only)
18. Prepare a check list of everything a business needs to do to conduct business in the City including storage of hazardous materials
19. Adopt penalties for violators of City Codes



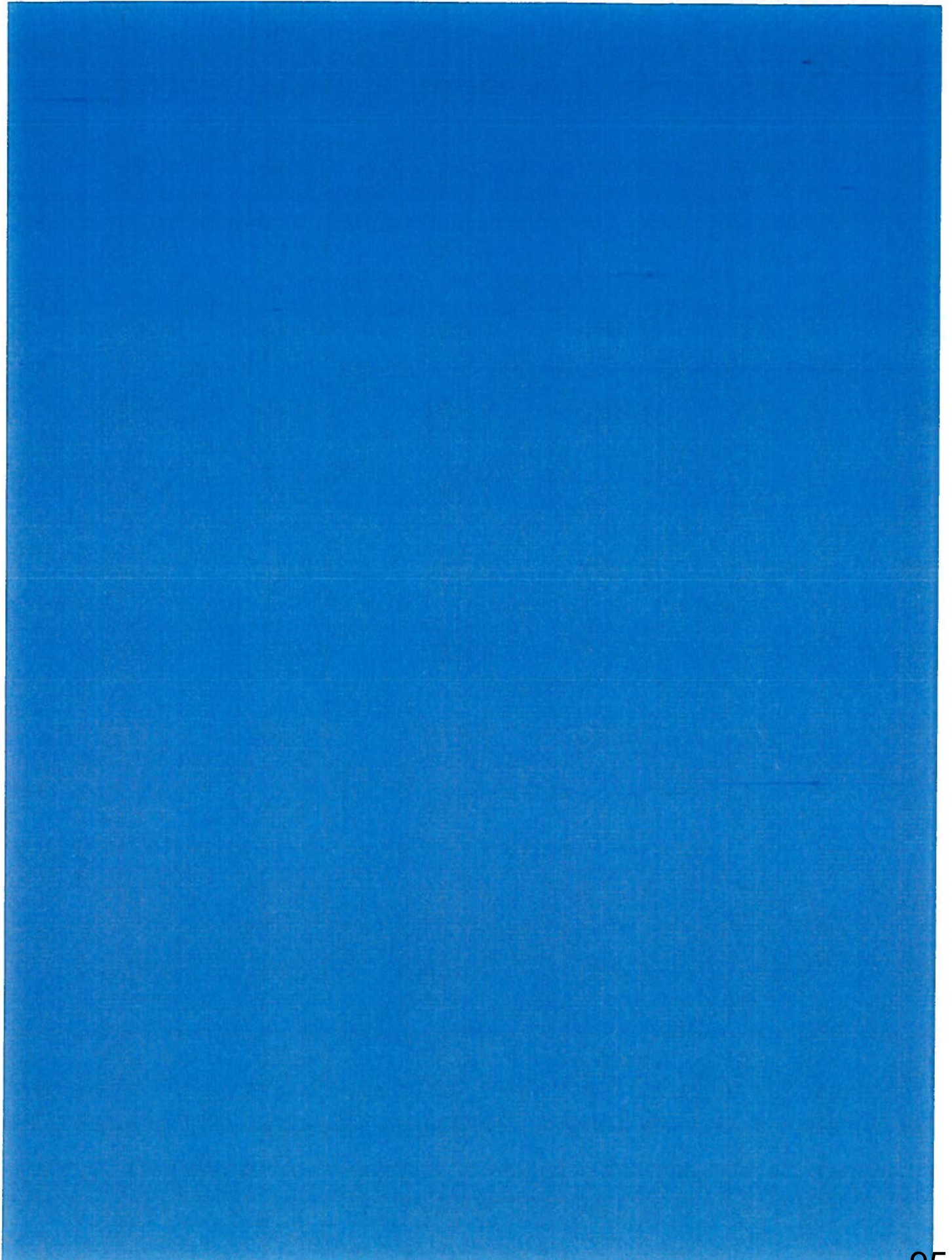
Land Use and Environmental Group

Topic Discussed and Suggestions

1. Why do we allow truck parking on non-truck routes
2. Get a copy of the General Plan Noise Contour Map
3. 9:00 PM to 6:00 AM most truck traffic
4. Stationary (from businesses) vs. moving sources of noise (from truck traffic)
5. Residents get used to noise from truck traffic
6. Check code enforcement logs for noise and air quality complaints
7. Identify hot spots for noise
8. In some cases changing to double pane windows are more cost effective than building sound walls
9. LAX expansion provided funding for noise mitigation, retrofitting double pane windows, HVAC systems, etc.
10. In most cases industrial use were built before residential uses
11. Air quality issues related to trucks are a regional issue and trucks are much cleaner than before and are getting cleaner. PM 2.5 is the biggest concern with trucks.
12. Moratorium not warranted
13. Focus on the issues so you get more cooperation from the industry
14. Future residents of residential areas being developed next to existing industrial areas should receive disclosure regarding impacts from the industrial areas.
15. Require appropriate noise mitigation such as walls and double pane windows for residential areas if they are proposed adjacent to industrial areas.
16. Committee asked for gas Tax and Transportation Revenue data
17. Next meeting Monday 4-17 at 10:00 AM

Main Recommendations:

18. Consider planting trees to help aesthetics and air quality and to some extent noise. This is especially important next to residential areas.
19. In terms of land use consider the following when residential is adjacent to industrial (may not be applicable in all cases, committee needs to identify sensitive areas that these apply):
 - a. Buffering standards to identify separation of residential uses from industrial uses such as setbacks, landscaping, walls, etc.
 - b. Limit the permitted uses to those consistent with residential.
 - c. Restrict hours of operation.
 - d. Other design and performance measures such as placing loading doors or employee break areas, loud speakers, etc. away from residential areas.
20. Review the exhibit that overlays the truck routes map and the General Plan noise contour map to determine noise impacts from roadway and trucks on adjacent residential areas. In addition, consider noise complaints.



Truck Routes and Sheriff

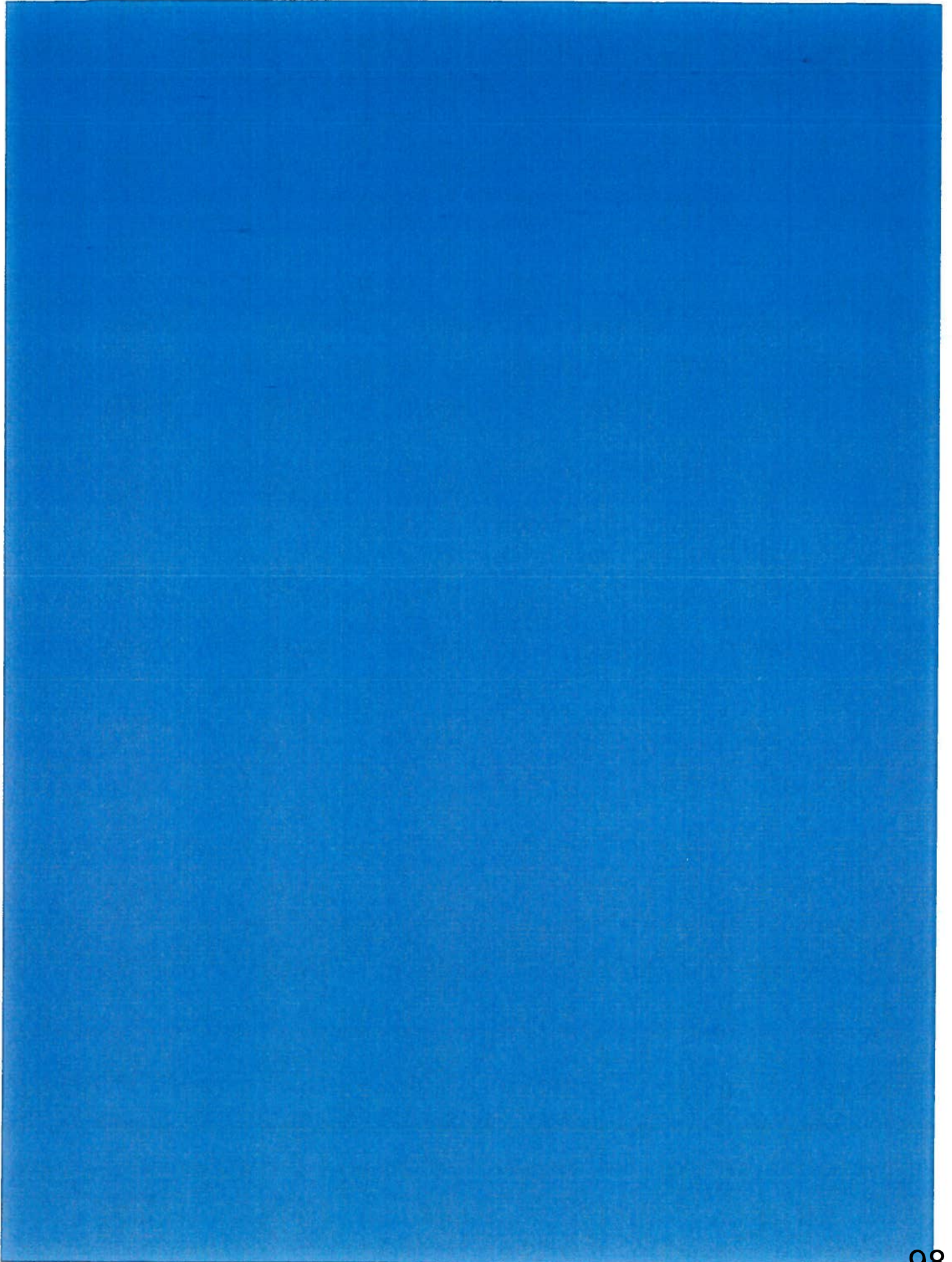
Topic Discussed and Suggestions

1. Residents get used to noise from trucks
2. Authority of the Sheriff for enforcement
3. Commercial enforcement needs specific training and requires unique skills. They deal with technical issues related to the operation of truck such as brakes, weight of the trucks, and cargo type.
4. Truck routes can be enforced by all deputies
5. CHP provides training for Commercial Enforcement (3 week course)
6. City of 19 square miles with lot of commercial and industrial areas puts a high demand on the deputies.
7. City needs to ensure complete truck route signage
8. Are the businesses given truck route maps?
9. Deputies can issue citations if trucks are not on truck routes (unless they are going to a Carson destination)
10. Deputies can re-route truckers to truck routes if they are in violation.
11. Quality of life of residents should matter when considering truck routes and truck related uses.
12. Truckers generally obey laws since they receive points on their licenses for moving violations. Their license is their livelihood.
13. The number of deputies for Carson has not increased over the past several years but population and number of businesses have increased.
14. Cost of each deputy is over \$250,000 per year for the City
15. For the past decade the numbers of calls have increased and unallocated time (time spent on cases but being seen on the streets as enforcers) has dropped. The Sheriff's priority is always violent crimes.
16. If there is little or no enforcement, the truckers can take advantage of the situation.
17. Commercial enforcers are in high demand and not even CHP has enough.
18. Over weight trucks can be identified by how quick they can speed up, how far it take them to stop, how they turn, etc. Officers can direct the weight limit offender to a weigh station. However, there is only one operating weigh station in LA County at Castaic Lake. Carson station is scheduled to open in the future.
19. In addition to the total cost of training, there is a cost to backfill deputies that are in training.
20. Some truck drivers/companies obey the overweight rules but others do not. Overweight trucks must have enough axels to reduce pressure on the road. In addition, they are supposed to have signs indicating they are overweight.
21. Sheriff can step up their training of deputies to deal with most trucking violations (other than those requiring certification).
22. Sheriff will be researching to see how many violations have been issued for trucks.
23. Truck route signage should be verified on Central to present trucks going to University.
24. If the Sheriff had the resources, enforcement can increase.

25. Technology (GPS) plays an important part on the routes truckers use.
26. A committee of trucking association, Sheriff, and City should be formed to meet regularly to communicate and provide information and feedback. The committee should study truck routes, rules, technology available to truckers, available grants, quality of life issues for the community, signage, etc.
27. Develop a hotline for the community to report truck related complaints and issues.
28. Send truck routes map to logistics and trucking companies.
29. Sheriff to explore generating reports on collisions and citations. City should map them.
30. Code enforcement complaints and parking enforcement data should be gathered.

Main Recommendations:

31. Form a committee of trucking industry, sheriff, City staff to discuss issues related to:
 - a. Study current truck routes to determine whether some should be removed or others added.
 - b. Explore technologies available to inform truckers about the latest truck routes
 - c. Explore available grant funding
 - d. Examine resident's quality of life issues related to truck routes
 - e. Ensure adequate signage is posted for truck routes/not truck routes
 - f. Use collision, citation, and complaint data available to the Sheriff and Code Enforcement to refine truck routes and address quality of life and safety issues.
32. Share truck route information with logistics companies and make them available through business license process





City of Carson

April 3, 2017

Dear Applicant,

On March 21, 2017, the City Council approved Interim Urgency Ordinance No. 17-1615U, implementing a 45-day moratorium on logistics facilities. Logistics facilities include "any warehouse for storage and transportation of goods, distribution facilities, logistics services such as, but not limited to, material handling, production, packaging, inventory, transportation, storage, warehousing, freight forwarding, deposit, storage, safekeeping, or parts thereof, industrial wholesale, self-storage, portable storage rental facility, truck terminals, hazardous materials and/or hazardous waste facilities, truck yards, cargo container storage and cargo container parking, manufacturing uses with less than 50% of floor area devoted to manufacturing." Additional definitions can be found in Section 2 of the Ordinance.

Your development project meets the classification of a logistics facility and, as such, staff must discontinue work on your project. The Ordinance provides for some exemptions from the moratorium, as well as some exceptions.

Exemptions

If your project qualifies for an exemption pursuant to Section 4 of the Ordinance, as determined by the Planning Division, you may proceed with your project. PLEASE NOTE: before proceeding with your project as exempt from the Ordinance, you must obtain approval by the Planning Division. To request approval of your project as exempt from the Ordinance, please email me as soon as possible with your request, including an explanation as to why you believe your project is exempt from the Ordinance, and provide all relevant information and documentation. If the project qualifies for an exemption, it will proceed through the normal City permit and entitlement procedures.

The following types of projects are not subject to the moratorium:

1. The annual renewal of an existing business license, any permits necessary for the routine maintenance of the buildings or sites, or any permits necessary for repairs required due to

an emergency or to protect the public health, safety, and welfare shall not be considered issuance of a permit.

2. Tenant improvements for current tenants within an existing building, provided the tenant improvements would not otherwise be considered an expansion or modification of the facility.
3. Any logistics facility that has obtained a vested property right in the use to which the moratorium applies.
4. Any logistics facility with 5 or fewer loading doors.
5. Any new or renewed lease agreement, provided that the term does not exceed 3 years.
6. Big box stores.

If your project does not qualify for one of the exemptions above, please read the Exceptions section below to determine whether your project qualifies for an exception as described below.

Exceptions

If you believe that your project qualifies for an exception pursuant to Section 6 of the Ordinance, as determined by the City Council, you may proceed with your project. In order to request City Council review of your project, please email me with your request, an explanation as to why you believe your project may qualify for an exception, and any supporting documentation as soon as possible. The request will be placed on the earliest City Council agenda.

The following may be subject to an exception to the Ordinance.

1. The City's receipt and consideration of an application for a permit to establish, expand, or modify a logistics facilities, within the City's jurisdiction is necessary for the preservation of the public health, safety, and welfare.
2. Application of the Ordinance would impose an undue financial hardship on a property or business owner.
3. If an existing building is empty on the effective date of this Ordinance, or a tenant moves out of an existing building during the effective period of this Ordinance, and the property or facility owner wishes to have a new tenant or new use, provided the Council makes the following findings: the new use is permitted or conditionally permitted in the zone; the City Council deems the proposed new use or new tenant to be consistent with the purposes of this Ordinance and the General Plan; and the proposed new use or new tenant will not be in conflict with the contemplated general plan update, any specific plan or zoning code update that the City Council is considering or studying or intends to study.

4. Land controlled by the City or by any of its agencies and authorities, including transactions approved by the Department of Finance.
5. The developer or tenant agrees to form or to participate in a Community Financing District (CFD) to pay for ongoing City services including, but not limited to, road maintenance, landscape maintenance, lighting, public safety, storm water management, etc., to the satisfaction of the City Council.
6. The developer or tenant enters into a development agreement that guarantees the City the same financial assurances offered by a CFD.
7. The fiscal impact analysis for the business shows that the business will not have adverse negative fiscal impacts on the City.
8. The logistics facility will generate minimal or no truck traffic impacts.

The City is committed to working cooperatively and efficiently to achieve positive results for both its residents and its businesses. If you have any questions regarding any of the above, or would like further clarification regarding any of the exemptions or exceptions, please do not hesitate to contact me at (310) 952-1770 or snaaseh@carson.ca.us.

Thank you,



Saied Naaseh
Planning Manager
City of Carson