

CALPAK

CALIFORNIA PAK INTERNATIONAL, INC.

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May 30, 2017

Mr. Saied Naaseh
Planning Manager
City of Carson
710 East Carson Street
Carson, CA 90745

Subject: City of Carson Ordinance No. 17-1618U: Exemption Request

Dear Mr. Naaseh,

By way of this letter, JJ.ER, LLC (CALPAK) of 17706 South Main Street hereby requests an Exemption to Ordinance No. 17-1618U. This request is in accordance with Section 6. Exemptions of the Ordinance and provides for substantial evidence that the Exemption is warranted.

The subject property, currently vacant, was formerly accommodated a concrete batch plant and outdoor vehicle parking. The proposed new building application package, submitted to the City on December 23, 2016, represents a high-quality development, aesthetically attractive and economically beneficial to the City and local community. Accordingly, this request for an Exemption is an affirmation of the ongoing process between the City and landowner for the improvement and enhancement of the property.

As detailed in Section 6 of the Ordinance, specific criteria are provided to justify the consideration of an Exemption. The Ordinance sets forth that an Exemption is justified if, "the City Council determines that any or a combination of the following:"

A. #1: The City's approval of an application for a permit to establish, expand, or modify logistics facilities, within the City's jurisdiction will not have a material negative impact upon the public health, safety or welfare.

The public welfare is preserved by the creation of new jobs, approximately 40, and the generation of new sources of City revenue. The building will accommodate the corporate headquarters and operations of a luggage and travel goods business. A hierarchy of jobs will be created to effectively operate the business. Concurrently, the new building will be a source of increased property tax, beyond the currently assessed property tax. Upon completion of the construction of the building and site improvements, the County will reassess the property and levy property tax accordingly. The City will share in this increased revenue source. In addition, the new building will be designated as the point-of-sale for the luggage products and the City would rightfully receive sales tax.

Exhibit No. 2

A. #5: The developer or tenant enters into an agreement that guarantees the City the same financial assurances offered by a CFD.

The landowner is agreeable to contributing the sum of \$2.00 per net interior building square footage as a Development Impact Program Fee. Concurrently, the landowner stands ready to review any Roadway Impact Fee or Community Facilities District, the elements and criteria fee proposed by the City to determine if such a fee equitably addresses the potential impacts caused by the proposed development.

A. #8: The facility enters into a development fees agreement with the City.

The landowner is agreeable to contributing the sum of \$2.00 per net interior building square footage as a Development Impact Program Fee.

A. #9: The use is permitted or conditionally permitted in the zone.

The proposed distribution facility and e-commerce and accommodated operations is a permitted use within the Manufacturing Light: Design Overlay Zoning District.

A. #10: The use is consistent with the purposes of this Ordinance and the General Plan.

The Ordinance identifies to importance of the Logistics facilities (Section 3: R) within the City of Carson. The purpose of the Ordinance is, in part, the protection of residential land uses proximate to industrial. This protection has been fulfilled through the placement of project related trucking operations at a minimum of 300 feet from residential land uses. Concurrently, a 30-foot landscape buffer with layered landscape material has been proposed along the eastern property line between the proposed building and the existing residences to the east.

The proposed distribution and e-commerce land use is consistent with the Industrial Land Use designation of the General Plan.

A. #11: The use will not be in conflict with and contemplated general plan, specific plan, or zoning code update that the City Council is considering or studying or intends to study.

The City Council has not identified any contemplated land use studies or modifications that would affect the proposed development. This Ordinance, by intent and composition, addressed the potential for impacts to land use and infrastructure and provides for equitable and effective mitigation.

A. #12: The use is not and will not become a hazardous materials facility, a truck yard, or container storage facility.

The proposed development will not accommodate hazardous materials facility, a truck yard or container storage facility. All operations will be limited to the distribution of premanufactured materials and the conduct of e-commerce.

A. #13: The use will not abut a sensitive land use, or impacts on an abutting sensitive land use can be adequately mitigated with reasonable conditions.

The portion of the building accommodating the trucking operation has been placed distant from the existing residential land uses to the east. Concurrently, a 30-foot landscape buffer with layered landscape material will be incorporated into the 30-foot buffer.

A. #14: The use will not constitute a threat to the public health, safety, and welfare.

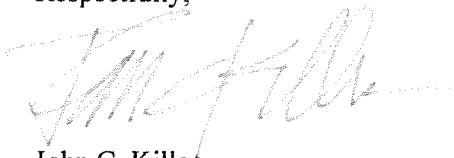
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B. If the City Council determines to allow an Exception pursuant to this section, then such applications and/or permits may be filed and processed in accordance with the City's then current regulations and authority, subject to the California Environmental Quality Act ("CEQA"), CEQA Guidelines, and any other applicable laws, ordinances, and regulations.


The landowner stands ready to comply with the City, acting as the CEQA Lead Agency in addressing any potential environmental impacts and provided effective mitigation.

Mr. Naaseh, please consider the information provided above and schedule this matter for a City Council determination within the time period detailed in the Ordinance. we stand ready to work with you toward an equitable resolution of the Ordinance restrictions. Please feel welcome to contact me if additional information is necessary or should questions arise,

Respectfully,



John C. Killen



Edward Kwon