



August 10, 2017

Ms. Rebecca Eisen, Chair &  
Members of the Board of Trustees  
California State University  
401 Golden Shore  
Long Beach, CA 90802

Subject: Carson as Lead Agency for the Environmental Review of the California State University Dominguez Hills Master Plan ("CSUDH-MP")

Honorable Chair Eisen & Members of the Board of Trustees:

As Mayor of the City of Carson, home of CSUDH, I have been directed by a unanimous City Council to reach out to the Board of Trustees to assert our position as the lead agency for all environmental review of the draft CSUDH-MP. This letter becomes all the more time sensitive given the meeting that occurred on Wednesday, August 9, 2017, between members of the CSUDH staff and City staff.

During that meeting, CSUDH staff advised City staff that the University (and not the City of Carson) would be issuing Notice of Preparation (NOP) of and the Draft Environment Impact Report (DEIR) for the CSUDH-MP. Indeed, the agenda reviewed at that meeting indicates that CSUDH intends to issue the NOP this month and circulate the DEIR in mid-October.

While the City appreciates the periodic outreach between CSUDH staff and City staff, the City Council is disappointed that, in none of those discussion, has CSUDH staff broached the subject of which public entity should act as the "lead agency" for purposes of complying with the California Environmental Quality Act ("CEQA"). **Accordingly, I write to assert the position of the City of Carson as the public entity that should, under the law, act as the "lead agency" for purposes of CEQA review of the CSUDH-MP.**

As you know, CSUDH is located in the very "heart" of our community. The draft master plan will make dramatic changes to your campus which will equally significantly impact the surrounding residential communities that are entirely within the City of Carson, but the impacts will extend far beyond the immediate neighborhoods around the campus for that matter and effect the entire City.

Given the location of CSUDH, it is most appropriate and only fair that the host City, *i.e.* Carson, for the University act as the "lead agency" for purposes of CEQA review of the CSUDH-MP (and not the University which has a much more narrow and obvious self-interested perspective on its own master plan).

Section 15051(b) of the CEQA Guidelines provides that the lead agency shall be the public agency with the greatest responsibility for supervising the project as a whole, and that the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose, such as the university. Pub. Res. Code § 21067; 14 Cal Code Regs § 15050; *Eller Media Co. v Community Redev. Agency* (2003) 108 Cal.App.4th 25, 38; *Planning & Conserv. League v Department of Water Resources* (2000) 83 Cal.App.4th 892, 903; *Friends of Cuyamaca Valley v Lake Cuyamaca Recreation & Park Dist.* (1994) 28 Cal.App.4th 419. It is very troubling that CSUDH has apparently unilaterally identified itself as the lead agency given the express language and intent of Section 15051(b).

Here, between the City and CSUDH, the City, as an agency with general governmental powers, obviously meets the criteria of subdivision (b) and CSUDH does not. Accordingly, the City of Carson is clearly the proper lead agency for review of the CSUDH-MP. Given the University's proposed highly compressed time-line for issuance of the NOP and DEIR, it is imperative that CSUDH immediately acquiesce to our request that the City of Carson will be the lead agency for purposes of CEQA review of the CSUDH-MP.

If we are unable to promptly reach an agreement satisfactory to the City, Carson is prepared to request that the Office of Planning and Research designate Carson the lead agency pursuant to Section 15053 of the CEQA Guidelines. We shall appreciate your prompt response to our request to meet and resolve the "lead agency" status of the City at your earliest possible convenience.

Very Truly Yours,



Albert Robles  
Mayor  
City of Carson

cc:           Honorable Members of the Carson City Council  
              Mr. Ken Farsing, City Manager  
              Sunny Soltani, Esq., City Attorney  
              Mr. John R. Raymond, Director of Community Development  
              Ms. Maria Slaughter, Director of Public Works  
              Mr. Timothy P. White, CSU Chancellor  
              Dr. Willie J. Hagan, President, CSUDH  
              Andrea G. Eaton, Esq., CSUDH Counsel  
              Ms. Naomi Goodwin, Interim Vice President, Administration & Finance, CSUDH  
              Mr. David Gamboa, Assistant Vice President, Government Relations, CSUDH  
              Mr. Jay W. Bond, AIA, CSUDH University Planning Consultant