

October 24, 2017

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

Re: **Ordinance Number 17-1618 in regards to 22636 South Alameda Street, Carson, CA**

Dear Mr. Naaseh:

In response to the passage of the ordinance No. 17-1618, we have put together the list of exceptions below that we believe we qualify for based on our understanding of Section 6A of Ordinance No. 17-1618.

We believe Mobile Mini would qualify for any of 9 different exceptions. Explanations of why Mobile Mini should qualify for exceptions 1, 2, 4, 8, 9, 10, 11, 13, and 14 as they read in Section 6A of Ordinance No 17-1618 are below:

- Per exceptions 1 and 14 of Section 6A, we believe that Mobile Mini operations will not have any material negative impacts or constitute a threat to public health, safety, and welfare. The reason for this belief is that the facility has been operating as a storage facility for well over 20 years, see aerial images in appendix D; the site is currently zoned as this use; is expected to remain as this use in the general plan/zoning code; and is surrounded by similar existing uses to the north, east, and south as shown in appendix E. It is important to note that the surrounding uses are already built out and are expected to remain.
- Per exception 2 of Section 6A, we believe that Mobile Mini operations will have an undue financial hardship on the property and the business owner. The reason for this belief is that Mobile Mini, the current business owner, will not be able to fully operate under the facility at its full potential without an additional modular building for staff and a maintenance facility (open air canopy) for repair of containers. It is important to note Mobile Mini currently has a business and AQMD permit to repair these containers on the facility, but no true area to conduct these repairs. Until such an area is constructed, the facility is not operating at its potential, costing the tenant money as the containers are now having to be repaired by a third party or at another facility and returned. This added cost also generates more truck trips to the facility, which in general concept, is against what the moratorium is trying to establish. The canopy and modular building per the cities building code cannot be placed onsite without a City of Carson building permit and, per Ordinance No 17-1618, we cannot pull any permits for the site until such time that an exception is granted to the facility. In addition to presenting an undue financial hardship on the tenant/business owner, the Ordinance presents a financial hardship on the property owner. The Ordinance places restrictions on the use of the facility and, as an existing landfill, the site is subject to City of Carson Municipal Code Section 19.141.12, attached as appendix F. This section specifies the restriction on the construction/placement of facilities on existing landfills and without receiving an exception from this section and constructing significant structural piers at this site, the current/existing use as a container facility is one of the only allowable uses.
- Per discussions with city staff, attendance at the City Council meetings, as well as the tenant's understanding of the road maintenance issues being faced by the City of Carson, Mobile Mini is willing to work with city staff through the CUP process and, prior to this item being presented in front of council again for final CUP approval, to either pay an impact fee for the number of truck/employee trips generated by the site, or enter into a development agreement with the city

to pay yearly maintenance fees based on the number of truck trips. As the city has not presented a set preference on the preferred fee/route we are willing to work with the Council and city staff on determining this preferred route. Per this agreement, we would respectfully request that we be allowed an exception from this Ordinance per exception 4 and 8 of Section 6A. With the approval of this exception Mobile Mini will be able to conduct full business operations on the site, but still would be required to receive CUP approval from City Council at a later date. As this CUP approval is still mandatory per the City's Municipal code, this insures that we will have to work with staff and come to an agreement regarding exception items 4 and 8, as until such point we would not have a full approved Conditional Use Permit for the site.

- Per exception 9, 10, and 11 of Section 6A this site is currently zoned as heavy industrial, zoning map attached as appendix G, and has a general plan designation as heavy industrial on a ORL zone, general plan map attached as appendix H, which permits storage container facilities, refer to attached appendix I. Based on the location of the site in the city and the existing surrounding land uses, we expect this zoning/designation to remain.
- Per exception 13 of Section 6A the site does not abut any sensitive land uses. Per the AQMD permit associated with 22636 South Alameda Street, the nearest sensitive land use to the facility is a residential house which is over 1,000 feet to the Northeast and located in the City of Long Beach, see appendix J. As seen in the appendix the 1,000 feet crosses the Union Pacific's Intermodal Container Transfer Facility located at 2401 East Sepulveda, City of Long Beach. This facility based on the size and pure volume of containers is expected to generate significantly more noise and traffic than the facility we are discussing herein; therefore, it is our belief that this site qualifies for exception 13.

In summary per Section 6 of Ordinance No 17-1618, City Council can grant an exception to a property based on 1 of the 14 exceptions presented in the section. As demonstrated above it is our belief, based on the above and attached supporting documentation, that this project located at 22636 South Alameda Street, qualifies for 9 (nine) of these exceptions. As such, we respectfully request that you support are exceptions and that the Mayor, Mayor Pro Tem, and rest of the City Council consider this letter as we would like the opportunity to continue to work with staff on the CUP process we have already begun. Should the council accept these exceptions which we respectfully request that they do, we can promise that we will work diligently with staff to continue the CUP process and ultimate produce a project that the Council, staff, and tenants are happy with. This project helps bring Mobile Mini, a 34 year old and \$500 million annual revenue public company, to the Carson economy and ultimately bring jobs and support to the City of Carson in its pursuit of Future Unlimited.

Respectfully,



Jacob Glaze – Project Manager