



# CITY OF CARSON

September 12, 2019

Dr. Thomas A. Parham, President  
 California State University, Dominguez Hills  
 1000 East Victoria Street  
 Carson, CA 90747

Subject: City of Carson's Comments on the Proposed Memorandum of Understanding

Dear Dr. Parham,

This letter is being sent to you at the direction of the Ad Hoc Subcommittee consisting of Mayor Robles and Mayor Pro Tem Hick. We would like to express our excitement for the Master Plan for the proposed expansion of the California State University at Dominguez Hills in Carson. We see the enlargement of the university student body, additional academic choices, and new student housing as a major benefit to the City of Carson, its residents, and the region. Therefore, the City supports the Master Plan concept in general since it will enhance the educational opportunities for the community and region. In addition, we consider the City and the University partners in ensuring the University and the City thrive together and provide educational excellence.

While we fully support the portion of the Master Plan related to educational purposes, the City has serious concerns regarding the proposed private for profit development on the remaining portions of the University property. As indicated in the Master Plan and the DEIR, the private development consists of 2,150 residential units, 100,000 square feet of retail space, and 570,000 square feet of business park space. The Master Plan is not clear what percentage of these uses is purely for educational purposes or directly would support the students and what percentage is for profit private development. The proposed uses of for profit private development will impact the City's infrastructure and services just like other private developments in the City. It is our understanding that for profit private development is necessary to fund the portion of the University that is for educational purposes and that the University will enter into long term land leases with private developers who will build housing, retail, and business park uses for a profit.

Even though we have a great relationship with your staff, our attempts have not been successful in resolving the issues the City is concerned about. The following provides a summary of the major issues that need to be discussed and resolved between us. Failure to do so may leave the City with no choice but to take further action that is not our preferred route:

1. During the public review of the DEIR, the City reached out to University staff to inform them that our Traffic Engineer consultant has identified unsupported and missing traffic analysis that made reviewing the conclusions of the traffic study impossible and requested an extension to the

public review process. However, the requested information was never submitted and the review period was never extended (previously, the review period was extended to address other missing information from the traffic study).

Therefore, the City commented on the DEIR without the benefit of an adequate traffic study. The City provided extensive comments on the Master Plan DEIR with our letter dated April 15, 2019. In the letter we stated that the traffic study included unsupported and missing traffic analysis amount other things. After submitting our comments, we never heard any response from your staff.

2. We are in receipt of your proposed Memorandum of Understanding (MOU) that includes a payment of \$3,826,419 to the City to mitigate the impacts of the project on all City roads. This amount is presumably based on the mitigation measures in the DEIR that the City is not in agreement with. The City provided comments on the DEIR and the associated traffic study during the public review period for the EIR. As stated above, and included in our April 15, 2019 comment letter, the traffic study analysis was flawed and the traffic impacts of the project could be significantly different than those included in the traffic study. Therefore, the resulting mitigation measures would not necessarily mitigate impacts of the project. In addition, some of the mitigation measures are infeasible, require additional right-of-way that does not appear to be included in the cost estimate, the cost of the improvements are calculated in today's dollars and will not necessarily be done today, there is an assumption that the City will be doing all the improvements, which we have not agreed to do or are willing to do since your project is causing the impacts. Therefore, it is very difficult to agree on traffic mitigation measures without a revised traffic study. Furthermore, your cost estimate is a preliminary cost estimate that is not based on designed plans and cannot be relied on in the MOU.
3. Your letter dated September 5, 2019, states that, if needed, at a future time the University would discuss the payment of City's Citywide Development Impact Fees (DIF) and Citywide Community Facilities District (CFD) even though the MOU states the University disagrees with the City's position that DIF and CFD should be paid by the private for profit developers. This offer does not provide the City any assurances that we will be able to come to a mutual agreement in the future. The City believes the private for profit developers should pay the DIF just like any other developer in the City when they are ready to build their project. Certain credits may be applied toward the infrastructure improvements the developers construct. The DIF fees will mitigate the impacts of the private for profit projects on the City's infrastructure and are applicable to all projects in the City.

In addition, the private for profit developers will be required to pay the on-going Citywide CFD annual fee based on the intensity of the project. Certain credits may be applied toward some of the services if the project provides those services. The CFD amount will be applicable for each project prior to each developer for a proposed project pulling their first building permits. These fees will mitigate the impacts of projects on the City's services and are applicable to all projects in the City.

4. In addition, the following improvements are expected to be completed, just like any other private development:

- a. Install full width sidewalk along the north side of University Dr. from approximately 150 feet east of Coslin Ave. to Pepperdine Ave.
  - b. Install street lights on concrete pole with underground wiring along the north side of University Dr. from Coslin Ave. to Pepperdine Ave.
  - c. Install missing trees in the public right of way abutting the proposed development.
  - d. Expand existing sidewalk along Victoria by filling in approximately 1-1/2 ft. wide strip of concrete next to the back of existing sidewalk to meet ADA requirements.
  - e. Developer should address soil erosion issue during rainy days along the north side of University Dr., this can be accomplished by installing slough wall along the back of existing sidewalk, on-site regrading and adjusting drainage pattern.
  - f. Upgrade existing streetlights on wooden poles along Avalon Blvd. to concrete poles with LED lights and underground wiring.
  - g. Expand existing concrete sidewalk along Avalon Blvd. by filling in approximately 3-foot wide strip of concrete next to the back of the existing sidewalk.
  - h. Remove and replace existing broken and raised sidewalk abutting the proposed development site.
5. In addition, the following considerations are expected from all projects:
- a. Comply with City's Bike Master Plan.
  - b. Cooperate with the City to provide transit services that benefit both the City and the University.
  - c. Cooperate with the City to obtain grants to reduce the cost of implementing the University's Master Plan.

Based on the unresolved issues stated above, the City is not in a position "to waive any/all rights it may have to challenge on any legal grounds whatsoever CSU's certification of the CEQA adequacy of the CSUDH 2018 Campus Master Plan EIR and all related project approvals" as stated in the MOU. Therefore, we urge the University to work with City staff to resolve these issues in advance of the Board of Trustees taking any action on the Master Plan and the FEIR. Meanwhile if you have any questions, please contact me (310) 952-1729 or [sllanders@carson.ca.us](mailto:sllanders@carson.ca.us).

Sincerely,



Sharon L. Landers  
City Manager

cc:

Ron Coley, Interim Vice President, Administration and Finance  
Albert Robles, Mayor  
Cedric L. Hicks, Mayor Pro Tem  
John Raymond, Assistant City Manager - Economic Development