



Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: OPPOSE: Proposed Industrial CUP Ordinance

Dear Members of the Planning Commission

On behalf of the Harbor Association of Industry and Commerce (HAIC) I write in opposition to Proposed Industrial CUP Ordinance. This proposed Ordinance conflicts with already existing air quality regulations and create a set of adverse incentives to upgrading facilities in the City of Carson – upgrades that would create economic benefits as well as many of the safety and environmental aims the proposal claims to seek.

Currently, mitigation measures can be placed on specific projects on a case-by-case basis without a broad-sweeping CUP ordinance. The design and development criteria for many uses is in the existing zoning ordinances. The current zoning ordinances also regulate uses separate from construction; thus a CUP requirement is not needed. Additionally, a traffic study can be required for specific projects to analyze possible impacts without needing or requiring a CUP. This ordinance is unnecessary.

Further, the South Coast Air Quality Management District (SCAQMD) already regulates air quality issues. This proposed CUP Ordinance is incongruent with the Indirect Source Rule (ISR) for warehouse operations as promulgated by SCAQMD and incongruent with the most substantial rulemaking related to the siting and operation of warehouses in Southern California. Last year, the South Coast Air Quality SCAQMD adopted Rules 2305 and 316, which for the first time began regulating warehouses. The SCAQMD created the Warehouse Actions and Investments to Reduce Emissions (WAIRE) program to in order to reduce NOx, DPM and carbon emissions, and increase visits from zero- and near-zero emissions (ZE and NZE) trucks to warehouses.

Finally, this ordinance will prevent improvements to existing structures. The proposed Industrial CUP seeks to include “replaced or expanded warehouse or logistics facilities.” Such an ordinance would have the unintended consequence of preventing modernization/improvements of existing buildings. Such modernization would minimize safety issues and health impacts through the implementation of green technologies. The city should encourage such modernization, not penalize it with an onerous ordinance. Please reject this proposal.

Respectfully,

A handwritten signature in blue ink that reads "Henry Rogers".

Henry Rogers
Executive Director

cc: Mayor and City Council
City Clerk



Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: OPPOSE: Proposed Industrial CUP Ordinance

Dear Members of the Planning Commission

On behalf of South Bay Association of Chambers of Commerce, I write to respectfully oppose the adoption of Proposed Industrial CUP Ordinance. This proposed Ordinance would have substantial unintended consequences and result in massive strains to the local supply chain of goods coming through our local Ports and Carson's local warehouse facilities.

As written, the City is pursuing a regulation targeted at the warehouse facilities in our community. While we respect the City's goals in this process, we urge you to consider the key role these facilities play in not only supporting our local economy, but in ensuring reliable supplies of food, goods and all manner of critical supplies – from medicine and medical supplies to other day-to-day essentials.

Last year, amid unprecedented global disruptions to the goods movement supply chain, Governor Gavin Newsom signed Executive Order N-19-21 to alleviate congestion at California ports and ease supply chain issues. Specifically, the Executive Order highlighted that shipping container dwell times and street dwell times for containers were more than double the normal average due to bottlenecks further downstream in the supply chain, including insufficient warehouses to undock cargo. The proposed Industrial CUP is inconsistent with the Governor's Executive order to create short- and long-term solutions to the supply chain problem.

The proposed Industrial CUP ordinance would unfairly impose an entirely new and unnecessary regulatory regiment onto the warehouse/logistics industry that upholds our supply chain and keeps our lives moving.

We understand there are other issues in the process that led to this ordinance, as well as direct impacts to local employers. In sum, we urge careful thought about imposing such a restrictive ordinance and urge you to reject the policy as written.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mark a Waronek', is written over a thin horizontal line.

Mark Waronek
SBACC Chairman

cc: Mayor and City Council
City Clerk

September 13, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: **OPPOSE: Proposed Industrial CUP Ordinance**

Dear Planning Commission Members:

On behalf of Prologis, I write to respectfully oppose the adoption of Proposed Industrial CUP Ordinance. This proposed Ordinance would have substantial unintended consequences and result in massive strains to the local supply chain of goods coming through our local Ports and Carson's warehouse facilities.

As written, the City is pursuing a regulation targeted at the warehouse facilities in our community. We respect the City's goals in this process, and we urge the Commission to consider the key role these facilities play in providing a reliable supply of goods from medicine and medical supplies to consumer goods, and other day-to-day essentials including food.

Last year, amid unprecedented global disruptions to the goods movement supply chain, Governor Gavin Newsom signed [Executive Order N-19-21](#) to alleviate congestion at California ports and ease supply chain issues. Specifically, the Executive Order highlighted that shipping container dwell times and street dwell times for containers were more than double the normal average due to bottlenecks further downstream in the supply chain, including insufficient warehouses to undock cargo. The proposed Industrial CUP is inconsistent with the Governor's Executive order to create short and long-term solutions to the supply chain problem.

The proposed Industrial CUP ordinance would impose an entirely new and unpredictable regulatory regiment onto the warehouse/logistics industry that upholds our supply chain and keeps our lives moving.

We understand there are other issues in the process that led to this ordinance, as well as direct impacts to local employers. In closing, we urge careful thought about imposing such a restrictive ordinance and urge you to not support the policy as written.

Respectfully,

A handwritten signature in blue ink, appearing to read "KBS", written over a horizontal line.

Kim B. Snyder
President, West Region
Prologis

cc: Mayor and City Council
City Clerk



COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION

SoCAL CHAPTER

September 12, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: **OPPOSE: Proposed Industrial CUP Ordinance**

Dear Chair Thomas and Members of the Planning Commission

On behalf of NAIOP SoCal, we are strongly opposed to the Proposed Industrial CUP Ordinance. With over 1,100 members, NAIOP SoCal is the leading nonprofit organization for developers, owners and investors of office, industrial, retail and mixed-use real estate throughout Southern California.

This proposed Ordinance is unnecessary and will produce little new value for residents – but instead cause substantial harm to local jobs and employers. Mitigation measures under existing city regulations can be placed on specific projects on a case-by-case basis without enacting a broad-sweeping CUP ordinance.

The CUP requirement would add substantial time and costs for projects while providing no added value to residents, businesses and the community in Carson. This proposed regulation will halt commerce in the City and create damaging impacts for businesses both within Carson and in neighboring communities as well.

Warehouses and logistics centers provide a broad range of jobs for people with diverse levels of education and skill sets, and support working families. The San Pedro Bay Ports are an economic engine responsible for approximately 3.1 million jobs throughout the nation. The warehouse and logistics industry in Carson serves as essential infrastructure to these ports, and one of the first stops in the supply chain supporting our local, regional and nation economies.

Additionally, we have concerns regarding inadequate consultation with local organized labor organizations. Only one labor group was invited to participate (the Teamsters) in the Ad-Hoc Committee that developed this policy. Other unions, and especially the various Building Trades, would be much more severely impacted by this ordinance and were not invited to participate. All stakeholders deserve a seat at the table.

Working collaboratively, we have been able to find solutions with a greater benefit for all stakeholders as it relates to concerns surrounding warehouse use and developments within local communities.

For the aforementioned reasons we ask that you oppose these new regulations.

Thank you.

Sincerely,

Timothy Jemal
CEO, NAIOP SoCal

cc: Mayor and City Council
City Clerk

NAIOP 2022 OFFICERS AND BOARD OF DIRECTORS

PRESIDENT

Gregory May, Newmark

PRESIDENT-ELECT

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Steve Pearson, DAUM Commercial

Jodie Poirier, Colliers International

John Premac, Chicago Title Company

Martin Pupil, Stream Realty Partners L.P.

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David Salisbury, U.S. Bank

Nancy Shultz, Duke Realty Corporation

Kurt Strasmann, CBRE

Richard Sung, Newmark

Christopher Tipre, Trammell Crow Company

Jay Todisco, Ware Malcomb

Sean Treglia, CBRE

Steven Hillgren, Kearny Real Estate Company

NAIOP SoCAL EXECUTIVE STAFF

Timothy Jemal, Chief Executive Officer

Jose Cornejo, Senior Director of Government Relations

Xavier Castaneda, Coordinator, Membership
& Communications

Becky Ezell, Director of Administration



September 12, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745
(Via Email)

Subject: **OPPOSE: Item 6B Proposed Industrial CUP Ordinance**

Dear Members of the Planning Commission;

On behalf of Harbor Trucking Association, I am writing to respectfully oppose the adoption of Item 6B, the Proposed Industrial CUP Ordinance. This proposed Ordinance would have substantial unintended consequences and result in massive strains to the local supply chain of goods coming through our local Ports and Carson's local warehouse facilities.

As written, the City is pursuing a regulation targeted at the warehouse facilities. While we respect the City's goals in this process, we urge you to consider the key role these facilities play in not only supporting our local economy, but in ensuring reliable supplies of food, goods and all manner of critical supplies – from medicine and medical supplies to other day-to-day essentials.

Furthermore, warehouses provide a broad range of jobs for people with diverse levels of education and skill sets, and support working families. The San Pedro Bay Ports are an economic engine responsible for approximately 3.1 million jobs throughout the nation. The warehouse industry in Carson serves as essential infrastructure to these ports, and one of the first stops in the supply chain supporting our local, regional and nation economies.

Last year, amid unprecedented global disruptions to the goods movement supply chain, Governor Gavin Newsom signed Executive Order N-19-21 to alleviate congestion at California ports and ease supply chain issues. Specifically, the Executive Order highlighted that shipping container dwell times and street dwell times for containers were more than double the normal average due to bottlenecks further downstream in the supply chain, including insufficient warehouses to undock cargo. The proposed Industrial CUP is inconsistent with the Governor's Executive order to create short- and long-term solutions to the supply chain problem.

Additionally, the CUP requirement would add substantial time and costs for projects while providing no added value to residents and/or businesses in the community. The city of Carson lacks adequate staffing to efficiently process an increased number of CUPs, and as written this ordinance applies not only to newly proposed projects, but existing ones as well. This ordinance has the potential to halt commerce in the City and create damaging impacts for businesses both within Carson and in neighboring communities as well.

Finally, this ordinance will prevent improvements to existing structures. The proposed Industrial CUP seeks to include “replaced or expanded warehouse or logistics facilities.” Such an ordinance would have the unintended consequence of preventing modernization/improvements of existing buildings. Such modernization would minimize safety issues and health impacts through the implementation of green technologies. The city should encourage such modernization, not penalize it with an onerous ordinance.

The proposed Industrial CUP ordinance would unfairly impose an entirely new and unnecessary regulatory regiment onto the warehouse/logistics industry that upholds our supply chain and keeps our lives moving.

We understand there are other issues in the process that led to this ordinance, as well as direct impacts to local employers. In sum, we urge careful thought about imposing such a restrictive ordinance and urge you to reject the policy as written.

Respectfully,

A handwritten signature in black ink, appearing to read 'Matt Schrap', with a large, sweeping flourish underneath.

Matt Schrap
CEO, Harbor Trucking Association
matt@harbortruckers.org

cc: Mayor and City Council
City Clerk



"Promoting Jobs in a Competitive Business Climate"

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Re: OPPOSE: Proposed Industrial CUP Ordinance; September 13, 2022 Planning Commission Hearing, Agenda Item 6B

Dear Members of the Planning Commission,

On behalf of the Carson Dominguez Employers Alliance (CDEA), an alliance of the largest employers in the City of Carson, we are in strong opposition to the Proposed Industrial CUP Ordinance. This proposed Ordinance is unnecessary in the context of existing local zoning, regional agency (SCAQMD and CARB) regulations and state laws. It will produce little new value for residents – but cause substantial harm to Carson-based jobs and employers.

The CUP requirement would add substantial time and costs for projects while providing no value to residents and/or businesses in the community. The City of Carson lacks adequate staffing to efficiently process an increased number of CUPs, and as written this ordinance applies not only to newly proposed projects, but existing buildings as well. This is a recipe to halt commerce in the City, and create damaging impacts for businesses both within Carson and in neighboring communities as well.

Warehouses provide a broad range of jobs for people with diverse levels of education and skill sets, and support working families. The San Pedro Bay Ports are an economic engine responsible for approximately 3.1 million jobs throughout the nation. The warehouse industry in Carson serves as essential infrastructure to these ports. **Hundreds, if not thousands, of Carson residents enjoy middle-class salaries working in the logistics industry and this proposed Industrial CUP Ordinance threatens their livelihood.**

We also have concerns that there has been inadequate consultation with local labor organizations. Only one labor group (Teamsters) was invited to participate in the Ad-Hoc Committee on this policy. Other unions, especially the Building Trades, are more severely impacted by this proposed ordinance and were not invited to participate. Everyone deserves a seat at the table.

We ask that you vote NO and promptly reject this proposed "Industrial CUP Ordinance."

Respectfully,

A handwritten signature in black ink that reads "Katie Pauloff".

President
Carson Dominguez Employers Alliance

cc: Mayor, City Council, and City Clerk



PO Box 15624
Long Beach CA 90815
office: 310.982.1323
email: info@futureports.org
www.futureports.org

September 12, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Re: Agenda Item 6B: OPPOSE: Proposed Industrial CUP Ordinance

Dear Members of the Planning Commission:

On behalf of FuturePorts I write to respectfully oppose the adoption of Proposed Industrial CUP Ordinance. This proposed Ordinance would have substantial unintended consequences and result in massive strains to the local supply chain of goods coming through our local Ports and Carson's local warehouse facilities.

FuturePorts is a 501(c)(6) nonprofit advocacy coalition founded in 2005 to help coalesce the Southern California supply chain around the need to both grow the ports and to address the environmental, air quality, and quality of life issues that come with that growth. FuturePorts believes that a vibrant and healthy economic and environmental future for the ports is vital to us all. FuturePorts' vision is to realize the modernization of the Southern California ports in order to maintain their competitiveness through the successful completion of their development programs allowing for the economically viable and environmentally sustainable growth of the ports.

As written, the City is pursuing a regulation targeted at the warehouse facilities in our community. While we respect the City's goals in this process, we urge you to consider the key role these facilities play in not only supporting our local economy, but in ensuring reliable supplies of food, goods and all manner of critical supplies – from medicine and medical supplies to other day-to-day essentials.

Last year, amid unprecedented global disruptions to the goods movement supply chain, Governor Gavin Newsom signed Executive Order N-19-21 to alleviate congestion at California ports and ease supply chain issues. Specifically, the Executive Order highlighted that shipping container dwell times and street dwell times for containers were more than double the normal average due to bottlenecks further downstream in the supply chain, including insufficient warehouses to undock cargo. The proposed Industrial CUP is inconsistent with the Governor's Executive order to create short- and long-term solutions to the supply chain problem.

The proposed Industrial CUP ordinance would unfairly impose an entirely new and unnecessary regulatory regiment onto the warehouse/logistics industry that upholds our supply chain and keeps our lives moving.

Supporting SoCal's Sustainable Supply Chain



PO Box 15624
Long Beach CA 90815
office: 310.982.1323
email: info@futureports.org
www.futureports.org

We understand there are other issues in the process that led to this ordinance, as well as direct impacts to local employers. In sum, we urge careful thought about imposing such a restrictive ordinance and urge you to reject the policy as written.

Respectfully,

Marnie Primmer
Executive Director
FuturePorts

cc: Mayor and City Council
City Clerk

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: **OPPOSE: Industrial CUP Ordinance; 9/13/22 Planning Commission, Agenda Item 6B**

Dear Members of the Planning Commission,

I write on behalf of the Building Owners and Managers Association Greater Los Angeles (BOMA/GLA), which represents over 135 million square feet of commercial real estate across Los Angeles County.

I write to respectfully oppose the adoption of Proposed Industrial CUP Ordinance. This proposed Ordinance would have substantial unintended consequences and result in massive strains to the local supply chain of goods coming through our local Ports and Carson's local warehouse facilities.

As written, the City is pursuing a regulation targeted at the warehouse facilities in our community. While we respect the City's goals in this process, we urge you to consider the key role these facilities play in not only supporting our local economy, but in ensuring reliable supplies of food, goods and all manner of critical supplies – from medicine and medical supplies to other day-to-day essentials.

Last year, amid unprecedented global disruptions to the goods movement supply chain, Governor Gavin Newsom signed Executive Order N-19-21 to alleviate congestion at California ports and ease supply chain issues. Specifically, the Executive Order highlighted that shipping container dwell times and street dwell times for containers were more than double the normal average due to bottlenecks further downstream in the supply chain, including insufficient warehouses to undock cargo. The proposed Industrial CUP is inconsistent with the Governor's Executive order to create short- and long-term solutions to the supply chain problem.

The proposed Industrial CUP ordinance would unfairly impose an entirely new and unnecessary regulatory regiment onto the warehouse/logistics industry that upholds our supply chain and keeps our lives moving.

We understand there are other issues in the process that led to this ordinance, as well as direct impacts to local employers. In sum, we urge careful thought about imposing such a restrictive ordinance and urge you to reject the policy as written.

Respectfully,

Aaron Taxy
Director of Government and Public Affairs
Building Owners and Managers Association Greater Los Angeles

cc: Mayor and City Council
City Clerk



Laborers'
International
Union of
North America

LiUNA!

Local 1309

9/12/22

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

RE: **OPPOSE: Proposed Industrial CUP Ordinance**

Dear Chair Thomas and Members of the Planning Commission

I write to you today on behalf of Laborers International Union of North America Local 1309 in strong opposition to Proposed Industrial CUP Ordinance. This proposed Ordinance is unnecessary in context of existing regulations and will produce little new value for residents – but cause substantial harm to local jobs and employers.

The CUP requirement would add substantial time and costs for projects while providing no added value to residents and/or businesses in the community. The city of Carson lacks adequate staffing to efficiently process an increased number of CUPs, and as written this ordinance applies not only to newly proposed projects, but existing ones as well. This is recipe to halt commerce in the City, and create damaging impacts for businesses both within Carson and in neighboring communities as well.

Warehouses provide a broad range of jobs for people with diverse levels of education and skill sets, and support working families. The San Pedro Bay Ports are an economic engine responsible for approximately 3.1 million jobs throughout the nation. The warehouse industry in Carson serves as essential infrastructure to these ports, and one of the first stops in the supply chain supporting our local, regional and nation economies.

We also have concerns that there has been inadequate consultation with local labor organizations. **Only one labor group was invited to participate (the Teamsters) in the Ad-Hoc Committee that developed this policy.** Other unions, and especially the various Building Trades, would be much more severely impacted by this ordinance and were not invited to participate. Everyone deserves a seat at the table.

For the reasons above we ask that you promptly reject this proposal.

Respectfully,

Mario Suales
Business Manager/Secretary Treasurer
LiUNA! Local 1309

cc: Mayor and City Council
City Clerk

MARIO SUALES
Business Manager-
Secretary Treasurer

PETER SANTILLAN
President

ARTURO ALVAREZ
Vice President

JOSHUA LA FARGA
Recording Secretary

ALFONSO MADRIGAL
JULIAN JIMENEZ
RAY REZA
Executive Board

3971 Pixie Ave.
Lakewood, CA 90712
562.421.9346
Fax: 562.421.5964

www.local1309.com

Feel the Power

September 9, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: Item 6B on the 9/13/2022 Planning Commission Agenda Regarding “Industrial Warehouse/Logistics Facility Development Standards and Land Use Regulations” – OPPOSE

Dear Honorable Members of the Planning Commission:

On behalf of our approximately 750 members from across the greater Long Beach area, we want to relay our opposition to the Proposed Industrial CUP Ordinance. This proposed Ordinance conflicts with already existing air quality regulations and create a set of adverse incentives to upgrading facilities in the City of Carson – upgrades that would create economic benefits as well as many of the safety and environmental aims the proposal claims to seek.

Currently, mitigation measures can be placed on specific projects on a case-by-case basis without a broad-sweeping CUP ordinance. The design and development criteria for many uses is in the existing zoning ordinances. The current zoning ordinances also regulate uses separate from construction, thus a CUP requirement is not needed. Additionally, a traffic study can be required for specific projects to analyze possible impacts without needing or requiring a CUP. This ordinance is unnecessary.

Further, the South Coast Air Quality Management District (SCAQMD) already regulates air quality issues. This proposed CUP Ordinance is incongruent with the Indirect Source Rule (ISR) for warehouse operations as promulgated by SCAQMD and incongruent with the most substantial rulemaking related to the siting and operation of warehouses in Southern California. Last year, the South Coast Air Quality SCAQMD adopted Rules 2305 and 316, which for the first time began regulating warehouses. The SCAQMD created the Warehouse Actions and Investments to Reduce Emissions (WAIRE) program to in order to reduce NOx, DPM and carbon emissions, and increase visits from zero- and near-zero emissions (ZE and NZE) trucks to warehouses.

Finally, this ordinance will prevent improvements to existing structures. The proposed Industrial CUP seeks to include “replaced or expanded warehouse or logistics facilities.” Such an ordinance would have the unintended consequence of preventing modernization/improvements of existing buildings. Such modernization would minimize safety issues and health impacts through the implementation of green technologies. The city should encourage such modernization, not penalize it with an onerous ordinance.

By opposing this proposal, you will be supporting the modernization of buildings that can lead to reduced health ramifications. Therefore, we urge careful thought about imposing such a restrictive ordinance and urge you to reject the policy as written. Thank you for taking our views into account.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Harris". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeremy Harris
President & CEO
Long Beach Area Chamber of Commerce

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: **OPPOSE: Proposed Industrial CUP Ordinance**

Dear Members of the Planning Commission

On behalf of Environmental Noise Control and 18530 South Broadway LLC, I write in opposition to Proposed Industrial CUP Ordinance. This proposed Ordinance conflicts with already existing air quality regulations and create a set of adverse incentives to upgrading facilities in the City of Carson – upgrades that would create economic benefits as well as many of the safety and environmental aims the proposal claims to seek.

Currently, mitigation measures can be placed on specific projects on a case-by-case basis without a broad-sweeping CUP ordinance. The design and development criteria for many uses is in the existing zoning ordinances. The current zoning ordinances also regulate uses separate from construction, thus a CUP requirement is not needed. Additionally, a traffic study can be required for specific projects to analyze possible impacts without needing or requiring a CUP. This ordinance is unnecessary.

Further, the South Coast Air Quality Management District (SCAQMD) already regulates air quality issues. This proposed CUP Ordinance is incongruent with the Indirect Source Rule (ISR) for warehouse operations as promulgated by SCAQMD and incongruent with the most substantial rulemaking related to the siting and operation of warehouses in Southern California. Last year, the South Coast Air Quality SCAQMD adopted Rules 2305 and 316, which for the first time began regulating warehouses. The SCAQMD created the Warehouse Actions and Investments to Reduce Emissions (WAIRE) program to in order to reduce NOx, DPM and carbon emissions, and increase visits from zero- and near-zero emissions (ZE and NZE) trucks to warehouses.

Finally, this ordinance will prevent improvements to existing structures. The proposed Industrial CUP seeks to include “replaced or expanded warehouse or logistics facilities.” Such an ordinance would have the unintended consequence of preventing modernization/improvements of existing buildings. Such modernization would minimize safety issues and health impacts through the implementation of green technologies. The city should encourage such modernization, not penalize it with an onerous ordinance. Please reject this proposal.

Respectfully,

Max Behrens

Max Behrens
Asset Manager
Environmental Noise Control
18530 South Broadway LLC

cc: Mayor and City Council
City Clerk



September 12, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: **OPPOSE: Proposed Industrial CUP Ordinance – Agenda Item 6B**

Dear Members of the Planning Commission

On behalf of Los Angeles Real Estate Management, Inc., I write in opposition to Proposed Industrial CUP Ordinance. This proposed Ordinance conflicts with already existing air quality regulations and create a set of adverse incentives to upgrading facilities in the City of Carson – upgrades that would create economic benefits as well as many of the safety and environmental aims the proposal claims to seek.

Currently, mitigation measures can be placed on specific projects on a case-by-case basis without a broad-sweeping CUP ordinance. The design and development criteria for many uses is in the existing zoning ordinances. The current zoning ordinances also regulate uses separate from construction; thus, a CUP requirement is not needed. Additionally, a traffic study can be required for specific projects to analyze possible impacts without needing or requiring a CUP. This ordinance is unnecessary.

Further, the South Coast Air Quality Management District (SCAQMD) already regulates air quality issues. This proposed CUP Ordinance is incongruent with the Indirect Source Rule (ISR) for warehouse operations as promulgated by SCAQMD and incongruent with the most substantial rulemaking related to the siting and operation of warehouses in Southern California. Last year, the South Coast Air Quality SCAQMD adopted Rules 2305 and 316, which for the first time began regulating warehouses. The SCAQMD created the Warehouse Actions and Investments to Reduce Emissions (WAIRE) program to in order to reduce NOx, DPM and carbon emissions, and increase visits from zero- and near-zero emissions (ZE and NZE) trucks to warehouses.

Finally, this ordinance will prevent improvements to existing structures. The proposed Industrial CUP seeks to include “replaced or expanded warehouse or logistics facilities.” Such an ordinance would have the unintended consequence of preventing modernization/improvements of existing buildings. Such modernization would minimize safety issues and health impacts through the implementation of green technologies. The city should encourage such modernization, not penalize it with an onerous ordinance. Please reject this proposal.

Respectfully,

Ed Whittemore
President
Los Angeles Real Estate Management Inc.
cc: Mayor and City Council
City Clerk



September 12, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: **OPPOSE: Proposed Industrial CUP Ordinance – Agenda Item 6B**

Dear Members of the Planning Commission

On behalf of Los Angeles Real Estate Management, Inc., I write in opposition to Proposed Industrial CUP Ordinance. This proposed Ordinance conflicts with already existing air quality regulations and create a set of adverse incentives to upgrading facilities in the City of Carson – upgrades that would create economic benefits as well as many of the safety and environmental aims the proposal claims to seek.

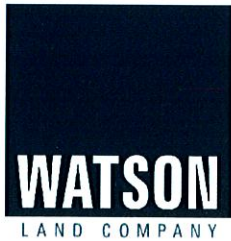
Currently, mitigation measures can be placed on specific projects on a case-by-case basis without a broad-sweeping CUP ordinance. The design and development criteria for many uses is in the existing zoning ordinances. The current zoning ordinances also regulate uses separate from construction; thus, a CUP requirement is not needed. Additionally, a traffic study can be required for specific projects to analyze possible impacts without needing or requiring a CUP. This ordinance is unnecessary.

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Respectfully,

Ed Whittemore
President
Los Angeles Real Estate Management Inc.
cc: Mayor and City Council
City Clerk



September 7, 2022

VIA E-MAIL

Honorable Members of the Planning Commission
701 E. Carson Street
Carson, California 90745
Planning@carsonca.gov / KBradshaw@carsonca.gov

**Re: OPPOSE: Proposed Industrial Conditional Use Permit (CUP) Ordinance;
September 13, 2022 Planning Commission Hearing, Agenda Item No. 6B**

Dear Members of the Planning Commission,

Watson Land Company is an owner and developer of master planned business and industrial centers in Southern California and the East Coast. The company strives to be a good corporate citizen by attracting quality companies that bring jobs and other economic benefits to the communities where Watson has real estate holdings.

We adamantly oppose the adoption of the Proposed Industrial CUP Ordinance. The City's proposed Industrial CUP Ordinance would have severe consequences at any time it were to be enacted, and those consequences will be severely intensified now, given the economy is still recovering from the supply chain issues that arose out of the COVID-19 pandemic. The City is pursuing a regulation targeted at a specific industry sector – the logistics industry - that provides essential services to our region and nation, provides the City with a significant tax revenue stream, and serves as a major employer to City residents. Given the City uniquely and importantly borders two of the most preeminent ports serving the continental U.S., ports that cannot be relocated, it is beholden on the City to act as an ambassador to the logistics industry, working with it to problem solve City concerns, as opposed to sabotaging it with perilous regulation.

Watson Land Company has the following specific comments/objections regarding the Proposed Industrial CUP:

1. **The proposed Industrial CUP includes EXISTING facilities, not simply NEW Construction, which constitutes an uncompensated taking.** The proposed Industrial CUP seeks to include “replaced or expanded warehouse or logistics facilities.” This constitutes an uncompensated taking. Further, such an ordinance would have the unintended consequence of preventing modernization/improvements of buildings. Modernization of existing buildings would minimize safety issues and health impacts through the implementation of green technologies. The City should encourage such modernization, not penalize it with an onerous CUP ordinance. Modernization often requires exterior improvements and including this in the proposed Industrial CUP ordinance will discourage health and safety benefits to the community and would be a lost opportunity for the City of Carson.
2. **The current zoning code is sufficient to address any impacts of traffic, air quality, and/or noise.** Currently, mitigation measures can be placed on specific projects on a case-by-case basis without a broad-sweeping CUP ordinance. The design and development criteria for many uses is

in the existing zoning ordinances. The current zoning ordinances also regulate uses separate from construction, thus a CUP requirement is not needed. Additionally, a traffic study can be required for specific projects to analyze possible impacts without needing or requiring a CUP.

3. **Inconsistent With Governor’s Executive Order Addressing Supply Chain Backlogs.** Last year amid unprecedented global disruptions to the goods movement supply chain, Governor Gavin Newsom signed Executive Order N-19-21 to alleviate congestion at California ports and ease supply chain issues. Specifically, the Executive Order highlighted that shipping container dwell times and street dwell times for containers were more than double the normal average due to bottlenecks further downstream in the supply chain, including insufficient warehouses to undock cargo. The proposed Industrial CUP is inconsistent with the Governor’s Executive order to create short- and long-term solutions to the supply chain problem. As stated in our opening paragraph, it is beholden on the City to collaborate with the logistics industry on a short and long-term basis to address the City’s concerns, while taking into account the important role the City plays in the national supply chain given its proximity to the Ports of Los Angeles and Long Beach.
4. **The proposed Industrial CUP ordinance is overreaching and increases uncertainty to the business community.** The CUP requirement would add time and cost for projects while providing no added value to residents and/or businesses in the community. Additionally, the City of Carson does not have adequate staffing to efficiently process an increased number of CUPs.
5. **SCAQMD already regulates air quality issues and the proposed CUP Ordinance is incongruent with the Indirect Source Rule (ISR) for warehouse operations.** The proposed CUP ordinance is incongruent with the most substantial rulemaking related to the siting and operation of warehouses in Southern California. Last year, the South Coast Air Quality Management District (SCAQMD) adopted Rules 2305 and 316, which for the first time began regulating warehouses as “indirect” sources of emissions. The SCAQMD created the Warehouse Actions and Investments to Reduce Emissions (WAIRE) program in order to reduce NOx, DPM and carbon emissions, and increase visits from zero- and near-zero emissions (ZE and NZE) trucks to warehouses.
6. **“E-commerce fulfillment centers” is an uncommon use in the City of Carson.** There is little demand for such new facilities. The proposed CUP ordinance is a solution in search of a problem. The entire warehouse industry should not be penalized for the sake of attempting to exclude one company (Amazon). Furthermore, Amazon recently stated publicly that they have implemented a strategy to shed significant excess fulfillment space nationally. This is bad public policy.
7. **Only one labor group (Teamsters) was invited to participate in the Ad-Hoc Committee.** The process taken to get to this point is flawed. Other unions (Building Trades) would be much more severely impacted by this ordinance and were not invited to participate. Everyone deserves a seat at the table.
8. **Warehouses provide a broad range of jobs for people with diverse levels of education and skill sets, leading to upward mobility.** The San Pedro Bay Ports are an economic engine responsible for approximately 3.1 million jobs throughout the nation. The warehouse industry in Carson serves as essential infrastructure to these ports. This socioeconomic benefit is threatened by the proposed Industrial CUP ordinance.

In closing, existing laws and regulations require qualifying logistics use projects and warehouses to comply with a plethora of applicable local, state and federal environmental laws, such as the Porter-Cologne Water Quality Control Act, the Clean Water Act, the Clean Air Act, CARB and Regional AQMD rules and regulations, uniform building codes, fire codes, and of course CEQA. This myriad of laws and regulations ensures any potential impacts such as traffic, noise or air impacts are fully disclosed and mitigated. In other

words, existing law already forces new projects or the replacement and/or expansion of existing facilities to undergo the most rigorous environmental analysis and mitigation measures in the nation. It is why California is one of the most challenging places in the nation to develop, whether one is developing housing, commercial or industrial. The proposed Industrial CUP ordinance would unfairly impose an entirely new and unnecessary regulatory regiment onto the warehouse/logistics industry in addition to the burdensome compliance already in place and detailed above.

Furthermore, imposing more costs and uncertainty onto the business community given the almost certainty of a recession, soaring inflation, and rapidly increasing other costs makes a CUP requirement even more troubling and untimely. Should you have any questions or wish to discuss our perspective, please feel free to contact me.

Respectfully,



Jeffrey R. Jennison
President and Chief Executive Officer
Watson Land Company

cc: Mayor Lula Davis-Homes (*via email: LDavis-holmes@carsonca.gov*)
Mayor ProTem Jawane Hilton (*via email: JHilton@carsonca.gov*)
Council Member Jim Dear (*via email: JDear@carsonca.gov*)
Council Member Cedric Hicks (*via email: CHicks@carsonca.gov*)
Council Member Arleen Rojas (*via email: ARojas@carsonca.gov*)



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Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

September 9, 2022

Subject: **OPPOSE: Proposed Industrial CUP Ordinance**

Dear Members of the Planning Commission:

On behalf of the International Warehouse Logistics Association (IWLA) I write in opposition to the Proposed Industrial CUP Ordinance. This proposed Ordinance conflicts with already existing air quality regulations and creates a set of adverse incentives to upgrading facilities in the City of Carson – upgrades that would create economic benefits as well as many of the safety and environmental aims the proposal claims to seek.

Currently, mitigation measures can be placed on specific projects on a case-by-case basis without a broad-sweeping CUP ordinance. The design and development criteria for many uses is in the existing zoning ordinances. The current zoning ordinances also regulate uses separate from construction, thus a CUP requirement is not needed. Additionally, a traffic study should be required for specific projects to analyze possible impacts without needing or requiring a CUP. This ordinance is unnecessary.

Further, the South Coast Air Quality Management District (SCAQMD) already regulates air quality issues. This proposed CUP Ordinance is incongruent with the Indirect Source Rule (ISR) for warehouse operations as promulgated by SCAQMD and incongruent with the most substantial rulemaking related to the siting and operation of warehouses in Southern California. Last year, the South Coast Air Quality SCAQMD adopted Rules 2305 and 316, which for the first time began regulating warehouses. The SCAQMD created the Warehouse Actions and Investments to Reduce Emissions (WAIRE) program to in order to reduce NOx, DPM and carbon emissions, and increase visits from zero- and near-zero emissions (ZE and NZE) trucks to warehouses.

Finally, this ordinance will prevent improvements to existing structures. The proposed Industrial CUP seeks to include “replaced or expanded warehouse or logistics facilities.” Such an ordinance would have the unintended consequence of preventing modernization/improvements of existing buildings. Such modernization would minimize safety issues and health impacts through the implementation of green technologies. The city should encourage such modernization, not penalize it with an onerous ordinance. Please reject this proposal.

Respectfully,

Mike Williams
Executive Director CA Government Relations
IWLA

cc: Mayor and City Council
City Clerk



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

September 12, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

**RE: OPPOSE - Proposed Industrial CUP Ordinance; Item No. 6B
Planning Commission Hearing September 13, 2022**

Dear Members of the Planning Commission:

Simply put, the proposed Industrial CUP Ordinance contained in Zone Text Amendment No. 193-2022 is horrifically ill-conceived and awful public policy that should be rejected out of hand by this Planning Commission. It is like someone finding a single termite in their otherwise perfectly good and lovely home, and deciding that the best remedy to get rid of that single termite is to bulldoze down the entire house. Completely illogical, nonsensical and over-reaching – the same as this proposed CUP Industrial Ordinance. I am writing to you today on behalf of Carson Companies. Our company has been an integral thread in the fabric of this community since long before Carson became a municipality in 1968. In fact, our roots here trace back to the Dominguez family and the original Rancho San Pedro created in the 18th century. This proposed CUP Ordinance is bad for the residents of Carson, it is bad for the businesses of Carson and it is bad for the City of Carson. This proposed Ordinance is wholly unnecessary in context of existing regulations and will cement the City of Carson's reputation as being openly adverse and hostile to the entire business community.

The language of the Planning Commission Staff Report is full of blanket and unsupported conclusory statements about "adverse impacts" without providing any supporting data, hard facts or direct evidence. Do new warehouse buildings sometimes mean more trucks driving on designated truck routes? Yes, sometimes. But do you know what else new warehouse buildings ALWAYS mean? MORE JOBS! Many of the new jobs in these "warehouse" buildings are in sales, accounting, customer service and other clerical positions that pay strong wages. These employees spend their hard earned money in the local community, either at lunch time or going to and from work. This spending generates sales taxes that in turn support the City. Where in the staff report is this immense and significantly positive economic benefit addressed? It is not. Yet the Proposed Ordinance as drafted will have a giant stifling effect on this economic benefit and will eventually lead to the loss of jobs as

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building owners are prevented from updating and retrofitting their existing buildings and decide to move elsewhere in order to grow their businesses as well as attract and retain employees.

In addition to not having adequately consulted the local business community and failed to properly or fully analyze the economic consequences of this proposed CUP Ordinance, it is also a concern that there has been inadequate consultation with local labor organizations. **Only one labor group was invited to participate (the Teamsters) in the Ad-Hoc Committee that developed this policy.** Other unions, and especially the various Building Trades, would be much more severely impacted by this ordinance and were not invited to participate. Everyone deserves a seat at the table.

For the reasons above we ask that you promptly reject this proposal.

Respectfully,



Todd Burnight
Senior Vice President
Carson Companies

cc: Mayor and City Council
City Clerk

September 13, 2022

Honorable Members of the Planning Commission
City of Carson
701 E. Carson Street
Carson, California 90745

Subject: **OPPOSE: Industrial CUP Ordinance; 9/13/22 Planning Commission, Agenda Item 6B**

Dear Members of the Planning Commission,

The Los Angeles/Ventura Chapter of the Building Industry Association of Southern California, Inc. (BIASC-LAV) is a non-profit trade association of nearly 1,000 companies employing over 100,000 people, all affiliated with building housing for all. On behalf of our membership, I write in opposition to Proposed Industrial CUP Ordinance. This proposed Ordinance conflicts with already existing air quality regulations and create a set of adverse incentives to upgrading facilities in the City of Carson – upgrades that would create economic benefits as well as many of the safety and environmental aims the proposal claims to seek.

Currently, mitigation measures can be placed on specific projects on a case-by-case basis without a broad-sweeping CUP ordinance. The design and development criteria for many uses is in the existing zoning ordinances. The current zoning ordinances also regulate uses separate from construction, thus a CUP requirement is not needed. Additionally, a traffic study can be required for specific projects to analyze possible impacts without needing or requiring a CUP. This ordinance is unnecessary.

Further, the South Coast Air Quality Management District (SCAQMD) already regulates air quality issues. This proposed CUP Ordinance is incongruent with the Indirect Source Rule (ISR) for warehouse operations as promulgated by SCAQMD and incongruent with the most substantial rulemaking related to the siting and operation of warehouses in Southern California. Last year, the South Coast Air Quality SCAQMD adopted Rules 2305 and 316, which for the first time began regulating warehouses. The SCAQMD created the Warehouse Actions and Investments to Reduce Emissions (WAIRE) program to in order to reduce NOx, DPM and carbon emissions, and increase visits from zero- and near-zero emissions (ZE and NZE) trucks to warehouses.

Finally, this ordinance will prevent improvements to existing structures. The proposed Industrial CUP seeks to include “replaced or expanded warehouse or logistics facilities.” Such an ordinance would have the unintended consequence of preventing modernization/improvements of existing buildings. Such modernization would minimize safety issues and health impacts through the implementation of green technologies. The city should encourage such modernization, not penalize it with an onerous ordinance. Please reject this proposal.

Respectfully,



Bill McRenolds, President
BIASC/ LA Ventura Chapter



De'Andre Valencia, Senior VP
BIASC/ LA Ventura Chapter

*Baldy View
LA/Ventura
Orange County
Riverside County*