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Via Email and U.S. Mail

October 4, 2018

Candice Assadzadeh, Senior Planner
City of Riverside
Community & Economic Development Department
Planning Division
3900 Main St. 3rd Floor
Riverside, CA 92522
cassadzadeh@riversideca.gov

Re: Comment on Draft Environmental Impact Report, California Baptist University Specific Plan Amendment (State Clearinghouse #2016051004, GPA P15-0989, ZC P15-0987 and SPA P17-0543)

## Dear Ms. Assadzadeh:

I am writing on behalf of Laborers International Union of North America, Local Union No. 1184 and its members living in and around the City of Riverside ("LIUNA") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as California Baptist University Specific Plan Amendment (State Clearinghouse #2016051004, GPA P15-0989, ZC P15-0987 and SPA P17-0543) for California Baptist University, including all actions related or referring to the proposed construction of an additional 400,000 square feet of building area for academic, recreational, and student housing purposes and 805,000 square feet of parking structures with incidental office space as well as new and reconfigured educational, housing, administrative support, athletic, and other facilities located generally at 8432 Magnolia Avenue, APNs: 193-253-013, 193-321-034, -035, 193-322-028, 231-020-005 to 231-020-010, 231-020-026, 231-030-024, 231-030-027 to -029, 231-040-003, -004, 231-040-006, -007, 231-040-012, 231-040-014, 231-040-017, 231-040-023, 231-040-025, 231-040-027, 231-050-004, -005, 231-061-001 to 231-061-017, 231-070-007, 231-070-016, -017, 231-080-005, 231-080-009, 231-080-026 to -028, 231-090-067 in the City of Riverside ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. LIUNA request that the Community & Economic Development Department

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address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,

Richard T. Drury