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*Via Email and U.S. Mail*

March 1, 2019

Brian Norton, Planner  
City of Riverside  
Community & Economic Development Dept.  
Planning Division  
3900 Main Street, 3rd Floor  
Riverside, California 92522  
[bnorton@riversideca.gov](mailto:bnorton@riversideca.gov)

Colleen J. Nicol, MMC  
City of Riverside  
City Clerk's Office  
3900 Main Street, 7th Floor  
Riverside, CA 92522  
[city\\_clerk@riversideca.gov](mailto:city_clerk@riversideca.gov)

**Re: Comment on the The Exchange aka P18-0091 (GP), P18-0092 (RZ), P18-0093(PPE), P18-0094-0098(CUP), P18-0101(DR), P18-0424 (GE), P18-0100 (MCUP) and P18-0401(EIR)**

Dear Mr. Norton and Ms. Nicol:

I am writing on behalf of the Laborers International Union of North America, Local Union 1184 and its members living in the City of Riverside ("LIUNA"), regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as the The Exchange aka P18-0091 (GP), P18-0092 (RZ), P18-0093(PPE), P18-0094-0098(CUP), P18-0101(DR), P18-0424 (GE), P18-0100 (MCUP) and P18-0401(EIR) for applicant Jim Guthrie of AFG, LLC , including all actions related or referring to the proposed construction of a mixed-use project consisting of 482 multi-family residential dwelling units in 21 three-story buildings, multi-tenant commercial buildings, a vehicle fueling station, a drive-thru restaurant, two hotels, a Recreational Vehicle (RV) overnight parking component, and onsite activities (e.g., farmers market, outdoor entertainment), totaling 479,773 square feet of residential space, located in the northwestern section of the City of Riverside and generally bounded by Orange Street on the west, Strong Street on the north, State Route 60 on the south and Interstate 215 on the east 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 address these shortcomings in a revised draft environmental impact report ("RDEIR") and

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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 Drury  
Lozeau | Drury LLP