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Via Email and U.S. Mail

May 9, 2019

Manuel Acosta
City of Commerce
Public Works & Development Services Dept.
Planning Division
2535 Commerce Way
Commerce, CA 90040
Planning-Division@ci.commerce.ca.us

X Maryam Babaki, Director
City of Commerce
Director of Public Works & Development Services
2535 Commerce Way
Commerce, CA 90040
mbabaki@ci.commerce.ca.us

Re: Comment on Draft Environmental Impact Report, Citadel Expansion & 10 Acre Project
Draft Environmental Impact Report (Draft EIR) (SCH #2016091024)

Dear Mr. Acosta and Ms. Babaki:

I am writing on behalf of **Supporters Alliance for Environmental Rights ("SAFER")** regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as Citadel Expansion & 10 Acre Project Draft Environmental Impact Report (Draft EIR) (SCH #2016091024) for Citadel Holdings Group, LLC, including all actions related or referring to the proposed new development within the three areas (Area 1, Area 2, Area 3) equaling 1,007,202 square feet of total floor area; consisting of approximately 237,662 square feet of retail uses, 358,000 square feet of hotel uses, 270,000 square feet of entertainment/recreation uses, 16,540 square feet of food serving uses, 70,000 square feet of office uses, and 55,000 square feet of industrial uses located generally along the north side of Telegraph Road between Hoefner Avenue (on the west) continuing east to Washington Boulevard, on APNs: 6336-019-930, 6336-019-931, 6336-019-033, 6336-019-034, 9306-024-017, 6336-024-018, 6336-018-920, 6336-018-805, 6336-017-908, and 6336-010-908 in the City of Commerce ("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. SAFER request that the Planning Division 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,

A handwritten signature in blue ink, appearing to read "Richard T. Drury", is written over a blue horizontal line.

Richard T. Drury