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April 29, 2022

Via Email and U.S. Mail

Christina Taylor
Community Development Director
City of Beaumont
550 E. 6th Street
Beaumont, CA 92223
Email: ctaylor@beaumontca.gov

Nicole Wheelwright
Deputy City Clerk
Beaumont Civic Center
550 E. 6th Street
Beaumont, CA 92223
Email: nicolew@beaumontca.gov

Via Email Only

Carole Kendrick, Planning Manager
Email: ckendrick@beaumontca.gov

Re: Request for Immediate Access to Public Records – Beaumont
Summit Specific Plan Project (SCH No. 2021090378)

Dear Ms. Taylor, Ms. Wheelwright, and Ms. Kendrick:

We are writing on behalf of **Californians Allied for a Responsible Economy** ("CARECA") to request immediate access to any and all public records referring or related to the Beaumont Summit Specific Plan Project (SCH No. 2021090378) ("Project") proposed by the Exeter Cherry Valley Land, LLC ("Applicant"). This request includes, but is not limited to, any and all materials, applications, correspondence, resolutions, memos, notes, analyses, electronic mail messages, files, maps, charts, and/or any other documents related to the Project. This request does not include the Draft Environmental Impact Report ("DEIR") or documents referenced or relied upon in the DEIR, which we have requested in a separate letter pursuant to the California Environmental Quality Act.

O1-3

The Project entails the development of an approximately 188-acre site with e-commerce, commercial development, and open space components. The Project would also include 6.7 acres of public and private roads. The Project site is located (128-102)

O1-4

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within the San Geronimo Pass area, which is located between the Coachella, San Jacinto, and Moreno valleys and includes the incorporated cities of Banning, Beaumont, and Calimesa as well as the unincorporated communities of Cherry Valley, Cabazon, and Banning Bench in Riverside County, California. The following Assessor Parcel Numbers (APNs) are associated with the Project site: 407-230-22, -23, -24, -25, -26, -27, -28; 407-190-016; and 407-190-017.

01-4

This request is made pursuant to the California Public Records Act, Government Code §§ 6250, et seq. This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

01-5

We request *immediate access* to review the above documents pursuant to section 6253(a) of the Public Records Act, which requires public records to be "open to inspection at all times during the office hours of the state or local agency" and provides that "every person has a right to inspect any public record." Gov. Code § 6253(a). Therefore, the 10-day response period applicable to a "request for a copy of records" under Section 6253(c) does not apply to this request.

01-8

My contact information is:

U.S. Mail

Sheila Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

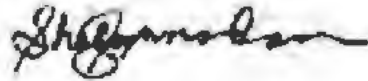
seannadan@adamsbroadwell.com

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I will be contacting you to arrange for duplication/transmission of the documents. If you have any questions, please call our South San Francisco office at (650) 889-1000. Thank you for your assistance with this matter.

CR-7

Sincerely,



Shaile M. Sannadan
Legal Assistant

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*Not a member of the State Bar of California
Licensed in California

April 29, 2022

Via Email and U.S. Mail

Christina Taylor
Community Development Director
City of Beaumont
550 E. 6th Street
Beaumont, CA 92223
Email: ctaylor@beaumontca.gov

Nicole Wheelwright, Deputy City Clerk
City Clerk's Office
Beaumont Civic Center
550 E. 6th Street
Beaumont, CA 92223
Email: nicolew@beaumontca.gov

Via Email Only

Carole Kendrick, Planning Manager
Email: ckendrick@beaumontca.gov

**Re: Request for Immediate Access to Documents Referenced in the
Draft Environmental Impact Report – Beaumont Summit
Specific Plan Project (SCH No. 2021090378)**

Dear Ms. Taylor, Ms. Wheelwright, and Ms. Kendrick:

We are writing on behalf of **Californians Allied for a Responsible Economy** ("CARECA") to request immediate access to any and all documents referenced, incorporated by reference, and relied upon in the Draft Environmental Impact Report ("DEIR") prepared for the Beaumont Summit Specific Plan Project (SCH No. 2021090378) ("Project") proposed by the Exeter Cherry Valley Land, LLC ("Applicant"). This request excludes a copy of the DEIR and its appendices. This request also excludes any documents that are currently available on the City of Beaumont website, as of today's date.¹

O1-16

The Project entails the development of an approximately 188-acre site with e-commerce, commercial development, and open space components. The Project would also include 6.7 acres of public and private roads. The Project site is located

¹ Accessed <https://www.beaumontca.gov/> on April 29, 2022.
6122-401j



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within the San Geronimo Pass area, which is located between the Coachella, San Jacinto, and Moreno valleys and includes the incorporated cities of Banning, Beaumont, and Calimesa as well as the unincorporated communities of Cherry Valley, Cabazon, and Banning Bench in Riverside County, California. The following Assessor Parcel Numbers (APNs) are associated with the Project site: 407-230-22, -23, -24, -25, -26, -27, -28; 407-190-016; and 407-190-017.

O1-17

Our request for *immediate access* to all documents referenced in the DEIR is made pursuant to the California Environmental Quality Act ("CEQA"), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire comment period.²

O1-18

I will be contacting you to arrange for the review/duplication/transmission of the requested records soon. In the interim, please use the following contact information for all correspondence:

U.S. Mail

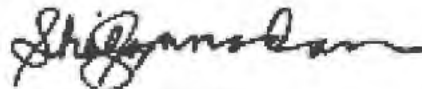
Sheila Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

ssannadan@adamsbroadwell.com

Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:lj

² See Public Resources Code § 21092(b)(1) (stating that "all documents referenced in the draft environmental impact report" shall be made "available for review"); 14 Cal. Code Reg. § 15087(e)(5) (stating that all documents incorporated by reference in the EIR . . . shall be readily accessible to the public"); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007) (EIR must transparently incorporate and describe the reference materials relied on in its analysis); *Santiago County Water District v. County of Orange* (1983) 118 Cal.App.3rd 818, 831 ("[W]hatever is required to be considered in an EIR must be in that formal report. . ."), internal citations omitted.
6128-012