



TECHNICAL MEMORANDUM

Date: March 22, 2019

To: David Vanderzell

From: Frank Barrera, Senior Planner – KOA Corporation

Subject: Traffic Study Technical Memorandum for Mixed-Use Project Located at Park Sierra Drive and Magnolia Avenue

KOA Corporation (KOA) is pleased to submit this technical memorandum to document the analysis of potential impact resulting from the change of use of an El Torito restaurant to a mixed-use dance studio class space and event hall.

1.1 PROJECT DESCRIPTION

The Project proposed by David Vanderzell (Client) will be repurposing a 10,666 Square foot commercial building, currently part of the larger 2.7 Million Square foot Park Sierra Development, a commercial center located along Park Sierra Drive near the intersection with Magnolia Avenue in the City of Riverside (City).

The previous use of the building to be repurposed was an El Torito, a high-turnover (sit-down) restaurant. The proposed land use consists of The Dance Center, a combination of dance instruction school and event hall, with the potential of expanding to light food sales for patrons of The Dance Center (Project).

The current site layout has 1 driveway directly leading to the project site along Park Sierra Drive, as well as four additional driveways leading to the commercial center along Park Sierra Drive and a total of 10 driveways providing access to the commercial center along the surrounding streets. The proposed Project will not make any modifications to the surrounding site or affect any of the access points.

The proposed Project Vicinity map is illustrated on Figure 1.1.

KOA Corporation has been retained to conduct a traffic impact assessment and prepare a technical memorandum addressing the City's comments regarding:

- Access to public Streets
- Vehicular Traffic in a resident zone
- Traffic Hazards to pedestrians

**Exhibit 13 - Traffic Study Technical Memorandum,
Prepared by KOA Corporation**

Figure I.1 – Project Vicinity Map

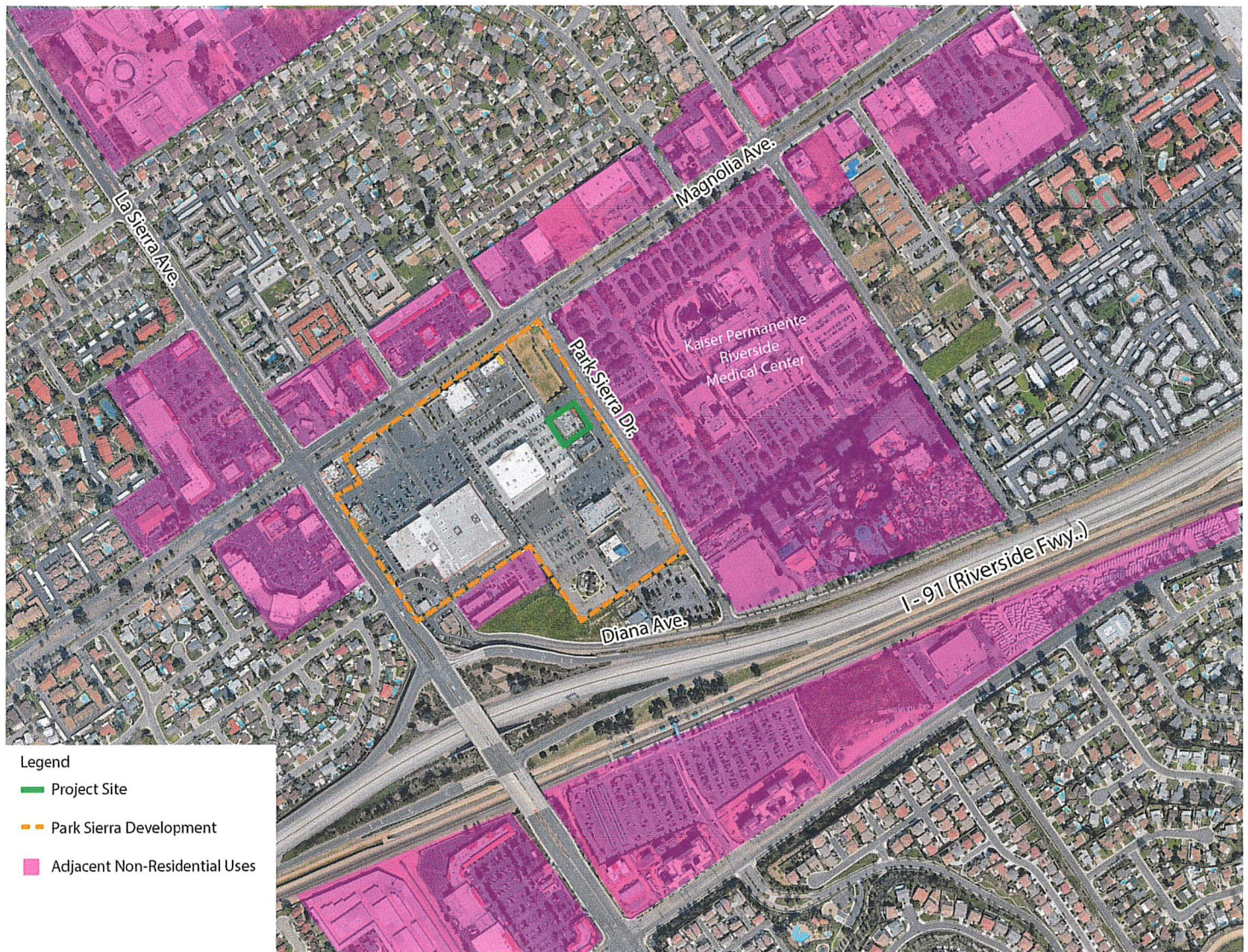


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Figure I.2 – Project Site Plan and Access Points

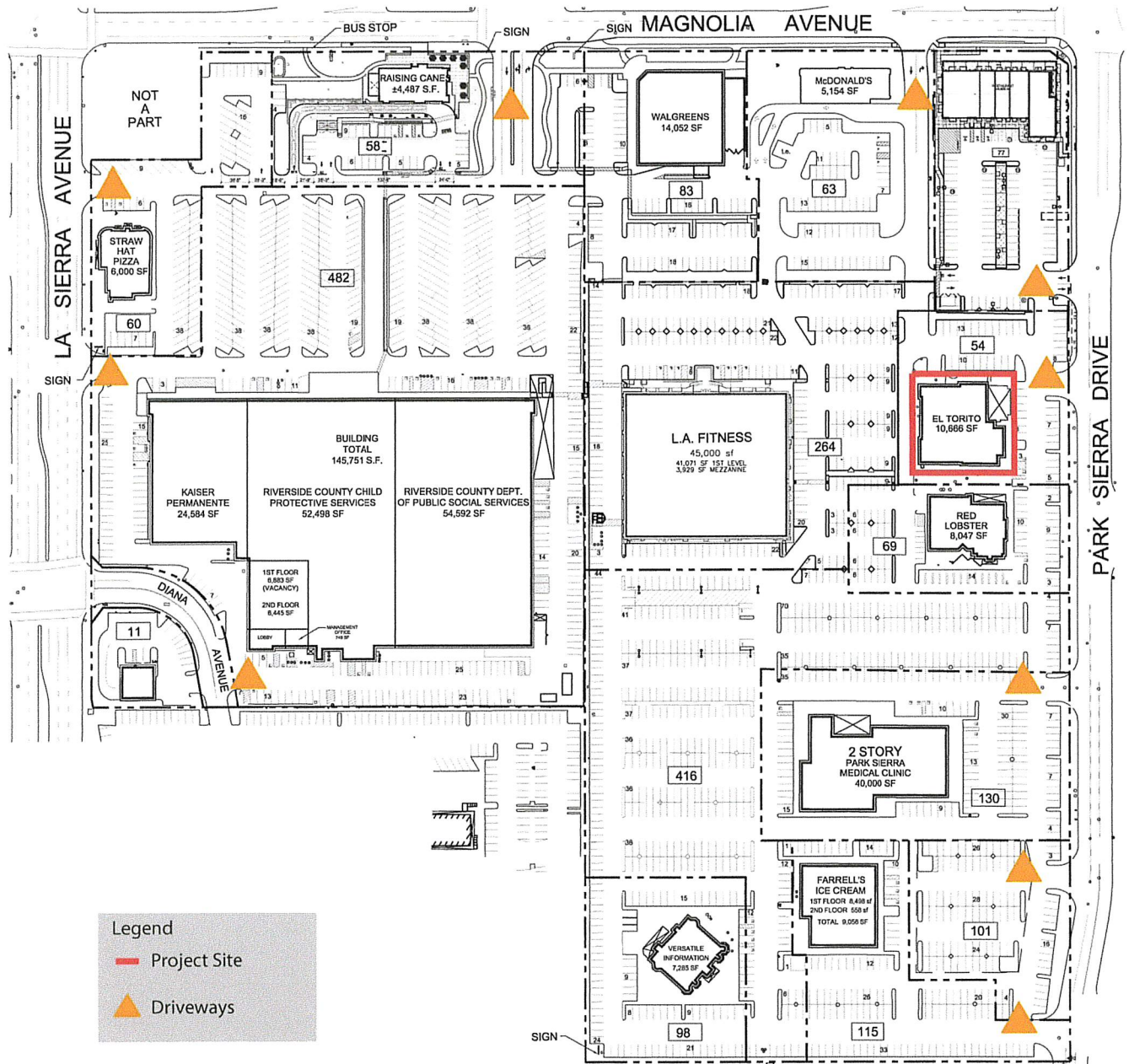


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1.2 ANALYSIS METHODOLOGY

The following text describes the study methodology contained in this report.

Site Accessibility

Accessibility was reviewed by considering access points to enter and exit the site, characteristics and connectivity of roadways surrounding the site, transit connections, and pedestrian infrastructure including sidewalks and crosswalks. Further details on the analysis can be found in Section 2.1.

Project Trip Generation

Project trip generation is typically based on land use trip rates defined by the Institute of Transportation Engineers (ITE) Trip Generation, 10th Edition. However, not all land uses being considered in the analysis are identified in the Trip Generation manual. In these cases, the most similar uses were selected to establish a general estimate. In addition to this analysis, rates during the weekend were not available to estimate trip generation. Instead, estimated trips were based on possible occupancy during the proposed Project's busiest period. Further details on the analysis can be found in Section 2.2.

Traffic Hazards to Pedestrians

Potential pedestrian hazards were reviewed by considering pedestrian infrastructure surrounding the site and pedestrian connections to surrounding streets. Further details on the analysis can be found in Section 2.3.

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2.1 SITE ACCESS TO PUBLIC STREETS ANALYSIS

The key roadways within the study area are described below. The discussion presented here is limited to specific roadways that traverse the Project site. Figure 2.1 provides a site plan showing nearby streets and driveway access points.

Park Sierra Drive is a north/south oriented street that is approximately 45 feet wide with three travel lanes and no on-street parking. The street has posted speed limit of 25 miles per hour and has a crosswalk with in-ground flashers for pedestrians crossing to and from the Kaiser Permanente parking lot across the street. Continuous sidewalks are provided throughout the street. A signalized intersection with a protected left turn provides access to Park Sierra Drive from Magnolia Avenue.

This street provides the most direct driveway access to the project site. In addition to the main Project driveway, there are four additional driveways on Park Sierra Drive alone that provide access to the Project's commercial center parking lot.

Magnolia Avenue is an east/west oriented street that is approximately 125 feet wide with four travel lanes, bike lanes in each direction, and a large 50 foot wide raised center median. Along this street there are several bus stops located along each side of the street.

This street provides two driveways that provide access to the Project's commercial center parking lot, including a signalized entrance to the site. Continuous sidewalks are provided throughout the street.

La Sierra Avenue is a north/south oriented street that is approximately 93 feet wide with six travel lanes, bike lanes in each direction, and a 6 foot wide raised center median.

This street is the furthest from the project site, but still has two driveways that provide access to the Project's commercial center parking lot. Continuous sidewalks are provided throughout the street.

Diana Avenue is an east/west oriented street that is approximately 32 feet wide with two travel lanes. The street is adjacent to and travels parallel with the Riverside Freeway, SR-91.

This street has one driveway that provides access to the Project's commercial center parking lot. Continuous sidewalks are provided throughout the street.

The abundance of driveways, high vehicle capacity roadways, bike infrastructure, pedestrian infrastructure, and transit connections provide adequate access between public streets and the Project site.

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2.2 PROJECT TRIP GENERATION ANALYSIS

Trip generation estimates were calculated using the Institute of Transportation Engineers' (ITE) Trip Generation, 10th Edition. Based on the general schedule of events provided by the client, included as Appendix A, during the AM peak period and PM peak period, the intended use of the space will be private lessons. Due to limited data available for this use, the rates from the most similar land use were utilized, Recreational Community Center (ITE Code 435). Since concurrent usage of the space is not expected during this time, other rates were utilized for weekday trip generation estimates. For the existing use rates, El Torito was classified as ITE land use, High-turnover (Sit-down) restaurant (ITE Code 932). Trip generation estimates can be seen in table 2.1.

Based on the estimates shown in table 2.1, the proposed project would not have a significant impact on traffic during the AM peak period or the PM peak period. The previous restaurant land use generated an estimated 1,197 daily trips with 106 AM peak period trips and 104 PM peak period trips, while the proposed land use would generate an estimated 307 daily weekday trips with 19 AM peak period trips and 25 PM peak period trips. This results in an estimated net trip reduction of 889 daily trips with a reduction of 87 AM peak period trips and 79 PM peak period trips.

In addition to this, the lessons offered from the studio begin at 10 AM. However, AM peak travel periods are typically between 7 AM and 9 AM. Thus, most traffic generated by the proposed Project will likely occur during off-peak periods in areas surrounding the project site.

Table I – Weekday Peak hour Trip Generation

Land Use	ITE Code	Intensity	Average Daily	Weekday							
				AM Peak Hour			PM Peak Hour				
				In	Out	Total	In	Out	Total		
Trip Generation Rates¹											
Recreational Community Center (Studio Classes)	495	k.s.f	28.82	66%	34%	1.76	47%	53%	2.31		
High-turnover (Sit-down) restaurant	932	k.s.f	112.18	55%	45%	9.94	62%	38%	9.77		
Proposed Improvements											
Recreational Community Center (Studio Classes)	495	10.666	k.s.f	307	13	6	19	12	13	25	
Sub-total			307	13	6	19	12	13	25		
Existing Use											
High-turnover (Sit-down) restaurant	932	10.666	k.s.f	(1,197)	(58)	(48)	(106)	(64)	(40)	(104)	
Sub-total			(1,197)	(58)	(48)	(106)	(64)	(40)	(104)		
Net Estimated Trips			(889)	(45)	(42)	(87)	(52)	(27)	(79)		

Rate Source: ITE Trip Generation, 10th Edition

1 = Note 1: k.s.f. - 1,000 Sq. Feet Gross Floor Area

2 = No AM Peak hour studies rates were available for ITE land use code 435

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Since the proposed project is planned to function as an Event Hall during the weekends, a separate analysis was conducted for the weekend peak period. For the previous restaurant land use the same ITE land use was utilized as the weekday estimates. The lowest trip generation rate for weekend peak periods was utilized in order to conduct a conservative evaluation. The rate utilized was for the Saturday peak generator period. This resulted in an estimated 1,305 daily trips with 119 peak period trips.

Due to data availability for specific land uses, an occupancy based trip generation was utilized with certain assumptions made for the calculation of the Event Hall on the weekends. Based on information provided by the client, up to 250 patrons may attend an event. For each event, it was assumed that there will be an average of 2 people per vehicle and an arrival rate of 60% during the first hour. Due to the nature of the events that will be held, the inbound trip rate will be 90% and the outbound trip rate will be 10%. With these assumptions in place, each weekend event would generate estimated 125 trips daily with 75 trips occurring during the peak period. The overall results can be seen in Table 2.2.

Although there is a slight increase of seven inbound trips during the weekend peak period compared to the restaurant use, outbound and total trips are reduced significantly during the peak period, with 7 and 75 trips estimated. This is due to the nature of the event hall use having a specific start time as opposed to a restaurant that generates trips throughout a wider range of time.

Table 2 – Weekend Peak period Trip Generation

Land Use	ITE Code	Intensity	Weekend				
			Average Daily	Peak Period			
				In	Out	Total	
Proposed Use							
Event Hall	N/A	250	Occupants	125	68	7	75
Sub-total					68	7	75
Existing Use							
High-turnover (Sit-down) restaurant	932	10.666	k.s.f	(1,305)	(61)	(58)	(119)
Sub-total					(61)	(58)	(119)
Net Estimated Trips					7	(51)	(44)

Rate Source: ITE Trip Generation, 10th Edition

1 = Note 1: k.s.f. - 1,000 Sq. Feet Gross Floor Area

2 = Lowest Weekend Peak Hour rate was utilized for this calculation

Additionally, the site is not directly adjacent to residential properties, minimizing the impact to residential zones. The site is bordered by a Kaiser Permanente Riverside Medical Center parking lot to the east, the remainder of the commercial center to the west, the SR-91 freeway to the south, and although there are residential uses to the north, they are buffered by existing commercial centers along Magnolia Avenue. This is shown in Figure 1.1.

Overall, no significant traffic impacts are expected as result of the Project when considering the most recent use of the building and the surrounding land uses in the area. The project may lead to a reduction of overall trips in the area based on the trip generation estimates.

**Exhibit 13 - Traffic Study Technical Memorandum,
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2.3 PEDESTRIAN TRAFFIC HAZARDS

In addition to the pedestrian infrastructure noted throughout section 2.1, the site and surrounding area have adequate, well-marked pedestrian crosswalks, pedestrian signage, and advanced yield pavement markers along Park Sierra Drive and throughout where necessary. Internally, traffic calming measures are put in place including speed bumps and crosswalks as well.

Adequate pedestrian infrastructure and the reduction of expected vehicle trips resulting from the proposed land use noted in section 2.2 should not result in a substantial increase in traffic hazards to pedestrians.

Exhibit 13 - Traffic Study Technical Memorandum, Prepared by KOA Corporation

3.1 ANALYSIS SUMMARY AND CONCLUSIONS

The following summarizes the traffic study results, conclusions and recommendations:

- The abundance of driveways, high vehicle capacity roadways, bike infrastructure, pedestrian infrastructure, and transit connections provide adequate access between public streets and the Project site.
- The previous restaurant (El Torito) land use generated an estimated 1,197 daily trips with 106 AM peak period trips and 104 PM peak period trips, while the proposed land use would generate an estimated 307 daily weekday trips with 19 AM peak period trips and 25 PM peak period trips. This results in an estimated net trip reduction of 889 daily trips with a reduction of 87 AM peak period trips and 79 PM peak period trips.
- Studio lessons offered begin at 10 AM. However, AM peak travel periods are typically between 7 AM and 9 AM. Thus, most AM traffic generated by the proposed Project will likely occur during off-peak periods in areas surrounding the project site.
- The lowest trip generation rate for weekend peak periods was utilized in order to conduct a conservative evaluation. The weekend peak period rate used was for the Saturday peak generator period. This resulted in an estimated 1,305 daily trips with 119 peak period trips. Each weekend event would generate estimated 125 trips daily with 75 trips occurring during the peak period.
- No significant traffic impacts are expected as result of the Project when considering the most recent use of the building and the surrounding land uses in the area. The project may lead to a reduction of overall trips in the area based on the trip generation estimates.
- Adequate pedestrian infrastructure and the reduction of expected vehicle trips resulting from the proposed land use noted in section 2.2 should not substantially increase traffic hazards to pedestrians.

KOA concludes that the Project's should not significantly impact any of the concerns noted from City staff.

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APPENDIX A – OCCUPANCY AND UTILIZATION TIMES

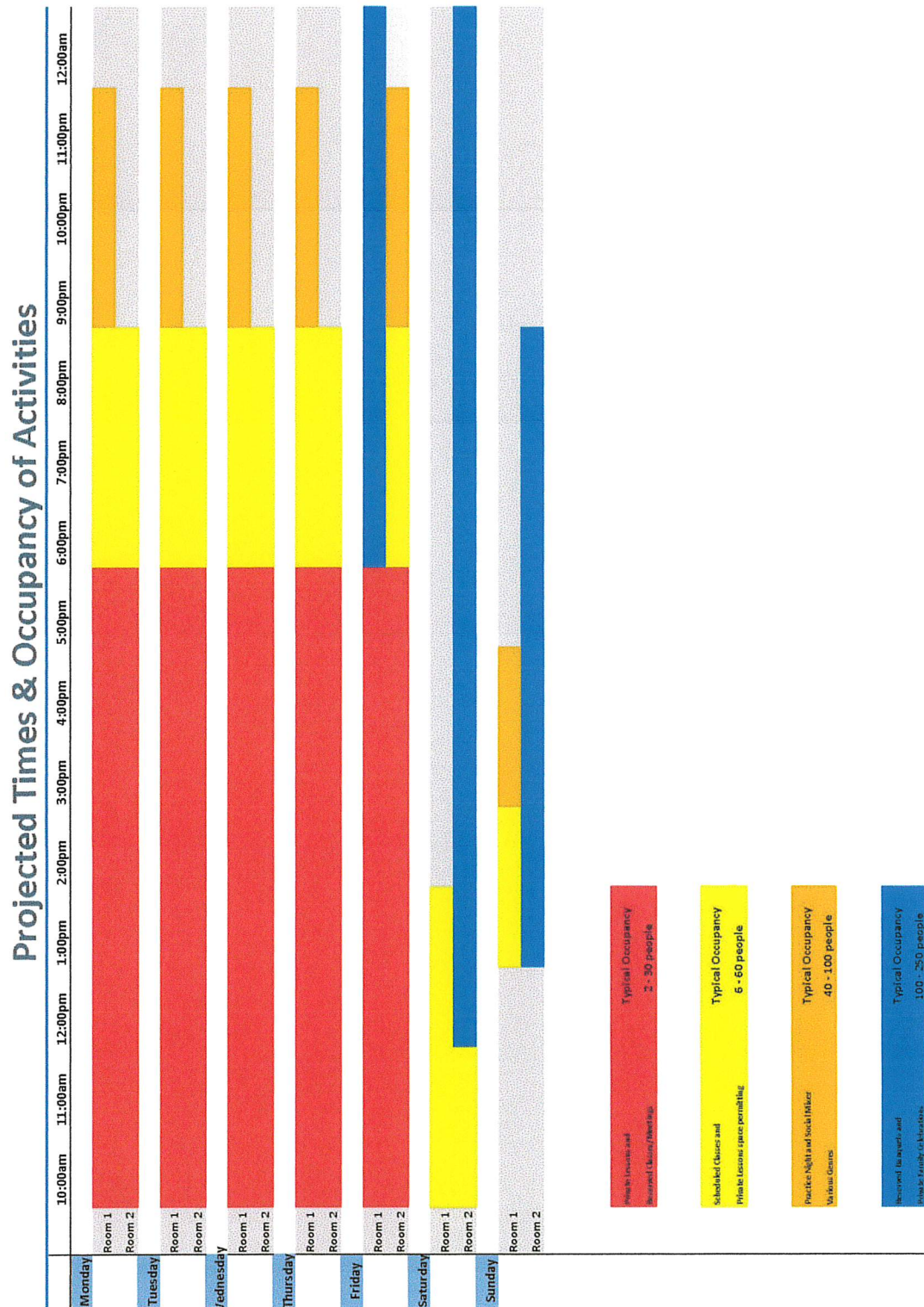


Exhibit 13 - Traffic Study Technical Memorandum, Prepared by KOA Corporation

From: [David Gilmore](#)
To: [Berlino, Alyssa](#)
Cc: [Brenes, Patricia](#); [Assadzadeh, Candice](#); [Perry, Jim](#); [Medina, Diana](#); [Rick Edwards](#); [Mary Ann Lerma \(MAPJCV@aol.com\)](#); "Chao Sun MD"; "Elizabeth Crago (ecrago@redlobster.com)"; "Justin Khorvash"; [Stephanie Doner](#); [Davidnguyen37921@gmail.com](#); [Ryan Edwards](#)
Subject: [External] 3740 Park Sierra Ave. (Former El Torito Restaurant) CUP, VR and PCORN Application/Notice of Public Hearing
Date: Thursday, August 01, 2019 11:09:10 AM

Alyssa,

We have received the Notice of Public Hearing for the THVS Investments (Applicant) Artivan Dance and Banquet Center CUP, VR and PCORN applications.

In response to these applications, GRAE La Sierra, LLC and SGLA Park Sierra, LLC, both adjoining property owners, object to both the (i) use and the (ii) grievous under-parking of the proposed development.

1. **Objection to Use;** Objection to the proposed change of use: the inclusion of the banquet/event center use will be significantly detrimental to the existing surrounding uses and businesses. The Applicant plans on providing banquet facilities for groups of 200 -250 people at the existing building and parking lot. This may or may not be in addition to the dance group occupancy requested for up to 40-100 people. Under the application, the Applicant can rent the facility to third party users that attract late night clientele that may result in crime, nuisance, property destruction and related actions that will have a negative and potentially dangerous impact on the surrounding uses and businesses. We had similar major problems in the past with InCahoots (a nightclub activity), that led to constant security and police involvement. As a result, we terminated the lease with the operators and demolished the building. We believe the City of Riverside has experienced similar problems in so-called banquet or event facilities operating under similar licenses that lead to crime and violence requiring constant police monitoring. Seville, operating under a similar license comes to mind. All the surrounding neighbors will all be adversely affected by such activity.
2. **Objection to Parking;** If the proposed change of use is approved, the Applicant will be required to provide a City of Riverside determined minimum requirement of 167 parking stalls. The Applicant's property provides only 54 stalls and is under-parked by 113 stalls
 - a. From a practical point of view parking will become a nightmare. The applicant's property parks only 54 cars. The overflow of cars and people will result in a parking, pedestrian and traffic burden to the adjacent L.A. Fitness, Red Lobster Restaurant and the five restaurant tenants located at the new Park Sierra Plaza building. Even a preliminary review of the overall project site plan leads to the conclusion that existing uses will be overburdened because of the under parked premises. **Take a real life look at the site plan; there is just no room to accommodate so many people without trampling on the rights of existing neighbors.**
 - b. We object to the City of Riverside's interpretation of the recorded CC&R's governing

the property. The City of Riverside has told us their interpretation of the recorded CC&R's is that the Applicant has the right to encumber 113 parking stalls located on surrounding property that the Applicant does not own. They have not told us specifically from which parcels these parking takings will come from. As a result, the non-applicant CCR property owners will lose 113 parking places and the right to develop or use parking on their own property as they see fit. This interpretation on the part of The City of Riverside would amount to a taking of property rights from the surrounding property owners for the sole benefit of the Artivan Dance and Banquet Center. . Moreover, it ignores other provisions of the CC&Rs that state when the overall property is fully developed it may contain up to 208,000 square feet of space with an overall parking ratio of no less than 5 parking spaces per 1,000 feet. The City's interpretation of the CC&Rs ignores and frustrates the overall development concept contained in the CC&Rs.

- c. Subject to the CC&R's paragraph 2.05 as amended, in reality there is no existing parcel at Park Sierra that has excess parking other than the approximate 3.5-acre currently undeveloped parcel that GRAE LA Sierra owns, located immediately south of the recently constructed LA Fitness Center. If the interpretation of the CC&R parking currently advocated by The City of Riverside is approved, GRAE La Sierra would be unable to fully develop this parcel and self-park to the satisfaction of Riverside parking requirements. **This would in fact prevent a much larger redevelopment initiative that we are contemplating on the Land we own fronting La Sierra, and it will violate and make impossible the provisions of the CC&Rs that allow for the development of up to 208,000 square feet of space on the property.**
 - d. GRAE La Sierra and SGLA Park Sierra agree that Article 4 of the recorded CC&R's provides for cross access and parking through a **non-exclusive easement agreement**, insuring that a customer could, for example, park on the L.A. Fitness property and walk over to the Red Lobster property for lunch, without risk of committing a parking violation. These types of CC&R'S and mutual access agreements are common in commercial real estate developments. A nonexclusive easement is another way of referring to a property easement, which gives access rights to a property so long as the property owners rights are respected. The nonexclusive easement agreement is reciprocal and is extended to all members of the CCR's and is not for the benefit of any single member. The recorded CC&R's do not allow for one property owner to encumber another property owner's parking without permission and use that parking to facilitate their own zoning or use approvals. This Application does not respect our property rights. In any event, **the CC&R's are not a substitute for the City requiring self-parking for a tenant's intended use.**
3. We are presently uncertain if there is a variance request included in the Application and would like to receive the applicable information to understand the variance request and it's justification.

GRAE La Sierra and SGLA Park Sierra have retained counsel to represent their interests regarding the THVS applications. It is our intention to deliver counsel's written notice of our specific objections to you by Thursday, August 8th.

Should you have any questions or comments, please contact me at 310.849.7044.

I appreciate your assistance throughout this process.

Sincerely,

Dave Gilmore

Seagrove

Office 310.552.4900
Cell 310.849.7044
david@seagrovela.com

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Suite 350
Los Angeles, CA 90049

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August 6, 2019

Patricia Brens, Principal Planner
Alyssa Berlino, Assistant Planner
Planning Department
City of Riverside
3900 Main Street, 2nd Floor
Riverside, CA 92522

Re: Applicant THVS Investments, LLC
CUP P18-0849, VR P18-0850, PCORN 19-0512

Dear Ms. Brens & Ms. Berlino:

Our office represents GRAE La Sierra, LLC. GRAE owns property in the immediate vicinity of the proposed project including the parcels that contain McDonalds, Walgreens, Raising Cane, and the County of Riverside building.

The applicant seeks a CUP for a dance studio and banquet facility. The proposed project should be denied for the following reasons:

A. The use is inappropriate for the area.

The surrounding center is devoted primarily to office and restaurant uses. The proposed banquet facility is akin to a nightclub use. The banquet use is likely to conflict with the existing uses in the area and bring security issues to the parking lot and area businesses. The city's recent experience with Sevilla and its late hour nightclub use should serve as a lesson for how this use can detrimentally affect a surrounding office and restaurant area.

B. The parking demand created by the project is excessive and will impact the parking available for adjacent parcels.

The applicant's parking study shows a parking demand of 168 spaces. There are only 53 on site spaces. Although a reciprocal parking agreement affects the subject property, the areas to the immediate north (the Burger IM center) and to the northwest (a portion of the McDonald's) are not subject to this mutual parking agreement and will receive unauthorized parking from the new use. Although the LA Fitness parcel is part of the reciprocal parking agreement, its lot is frequently full. The area with the most available parking is south of the Red Lobster—too far away from the proposed use to provide effective parking relief. This 3.5 acre

Patricia Brens, Principal Planner
Alyssa Berlino, Assistant Planner
Planning Department
City of Riverside
August 6, 2019
Page 2

parcel, owned by my client, is currently undeveloped. The proposed project will absorb a significant number of the available spaces on this parcel, effectively taking my client's property without compensation. If the customers of the proposed project do not use my client's parcel for parking, the most likely area for parking will be unauthorized parking at the Kaiser facility across the street, an unacceptable alternative.

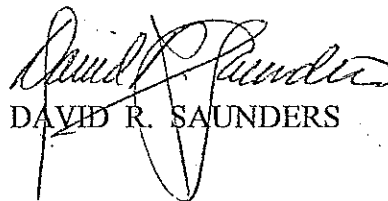
C. The parking demand for the project is not properly calculated.

The applicant's building is 10,666 sq. ft. The parking analysis shows the parking demand generated by 4,995 sq. ft. of a public assembly use. No parking demand is calculated for the office and other areas in the remaining 5,671 sq. ft. in the building. A correct calculation of the parking demand will confirm the need for even more parking spaces.

D. The use may not be permitted by the existing Declaration.

The project is governed by a Declaration Establishing Reciprocal Easements, Restrictions and Covenants, as amended, recorded December 31, 1980 in Book 1980, Page 244662, Riverside County Recorder (the "Declaration"). The dance school banquet center may not be a permitted use under Section 3.01 and 3.02 of the Declaration. The applicant should provide assurances that the use is permitted under the Declaration before the city approves the use.

Very truly yours,



DAVID R. SAUNDERS

DRS:dr
cc: GRAE La Sierra, LLC

DRS: GRAE La Sierra, LLC/General.0/LTR/080619Riverside



August 7, 2019

Federal Express Overnight & E-Mail Correspondence

City of Riverside Community & Economic Development Dept.
Planning Division
3900 Main Street
Riverside, CA 92522
Attn: Alyssa Berlino, Assistant Planner
(951) 826-5628
aberlino@riversideca.gov

Re: "Notice of Public Hearing" on August 22, 2019, concerning Applicant David Vanderzell of THVS Investments, LLC--Artivan Dance and Banquet Center; Project Location 3740 Park Sierra Avenue; Case Numbers P18-0849 (CUP), P18-0850 (VR) and P19-0512 (PCORN) (the "Proposed Project")

Dear Ms. Berlino,

I am Senior Real Estate Counsel to Fitness International, LLC, the company that owns and operates LA Fitness health and fitness clubs ("LA Fitness"). This correspondence is in response to the above-referenced Notice of Public Hearing.

LA Fitness has a long-term leasehold interest in the property located at 10988 Magnolia Avenue, Riverside, CA, whereon LA Fitness operates one of its full-service health and fitness clubs ("Riverside Magnolia LA Fitness," and the parcel on which the Riverside Magnolia LA Fitness is located is referred to herein as the "Riverside Magnolia Parcel"). The Riverside Magnolia Parcel is located adjacent to the property that is the subject of the Proposed Project.

For the reasons stated herein, LA Fitness strongly objects to the development of the Proposed Project.

The Proposed Project is extremely under-parking for the proposed use—i.e., the Applicant will be required by the City to provide a minimum of 167 parking stalls, while its parcel only contains 54 parking stalls. Therefore, the Applicant will be forced to use possibly over one hundred of the 255 parking stalls located on the Riverside Magnolia Parcel for the benefit of the property that is the subject of the Proposed Project, **potentially leaving only 142 parking spaces for use by LA Fitness' members, guests and employees on the Riverside Magnolia Parcel.**

While the recorded CC&Rs benefitting and burdening these properties provide for certain cross-access and cross-parking rights through non-exclusive easements, such rights are given to an adjacent property owner with the understanding that the parking rights of the property owner giving such rights are not materially infringed upon. The recorded CC&Rs simply do not permit one property owner (in this case, the Applicant) to encumber another property owner's parking rights to such an extent that the other property owner (LA Fitness) has insufficient parking for its approved use. Parking is critical to health clubs such as LA Fitness and without available parking stalls, LA Fitness will not receive the benefit given to it by virtue of its leasehold interest and the recorded CC&Rs.

As such overflow of vehicles onto the Riverside Magnolia Parcel will result in an extreme burden on the Riverside Magnolia Parcel to the detriment of the rights already granted to LA Fitness, LA Fitness strongly objects to the development of the Proposed Project.

Thank you for your time and consideration on this important matter.

Sincerely,



Diann D. Alexander
Director of Lease Administration
VP—Senior Real Estate Counsel

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August 30, 2019

Kristi Smith
Deputy City Attorney
City of Riverside

**Re: Applicant THVS Investments, LLC
CUP P18-0849, VR P18-0850, PCORN 19-0512**

Dear Ms. Smith:

Our office represents GRAE La Sierra, LLC. GRAE owns property in the immediate vicinity of the proposed project including the parcels that contain McDonalds, Walgreens, Raising Cane, and the County of Riverside building.

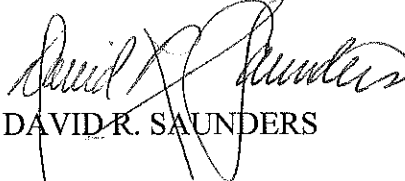
The applicant seeks a CUP for a dance studio and banquet facility. The proposed project should be denied for the following reasons:

The project is governed by a Declaration Establishing Reciprocal Easements, Restrictions and Covenants, as amended, recorded December 31, 1980 in Book 1980, Page 244662 (the "Declaration"). The dance hall and banquet facility may not be permitted uses under Section 3.01 and 3.02 of the Declaration.

Moreover, the applicant's parking study shows a parking demand of 168 spaces. The applicant will provide only 53 on site spaces. The applicant relies on my client's parcels and other parties' parcels that are subject to the Declaration to provide the remaining 105 spaces. This use is excessive and will compel my client and the other owners to seek a court injunction to restrain the excessive use. If my client is successful, the applicant's customers will be compelled to find parking on public streets in the neighborhood, an undesirable result for everyone.

When an applicant relies on offsite parking to satisfy its parking demand, the city should determine that the applicant actually has the right that the applicant claims. In this case, this applicant cannot establish its right to sufficient offsite parking. For that reason, the project should be denied.

Very truly yours,


DAVID R. SAUNDERS

DRS:dr

Grae La Sierra LLC/Proposed Dance Hall.1/LTR/083019Smith

Exhibit 14 - Comment Letters



Looking west at the project site.



Looking south at the project site.



Looking east at the project site.



Looking northeast at the project site.