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APR 12 2018

Community & Economic
Development Department

April 12, 2018

Rafael Guzman, Director
Community and Economic Development Department
City of Riverside
3900 Main Street
Riverside, California 92522

APPEAL OF RIVERSIDE PLANNING COMMISSION DECISION ON APRIL 5, 2018:
CENTER STREET COMMERCE CENTER PROJECT
PLANNING CASES P14-1033 (DR) & P14-1034 (LLA)
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Dear Mr. Guzman:

We hereby appeal the April 5, 2018 decision of the Riverside Planning Commission to uphold the Developmental Review Committee's approval of the Center Street Commerce Center Project--Planning Cases P14-1033 (DR) and P14-1034 (LLA), Initial Study and Mitigated Negative Declaration.

Our reasons are as follows, but not limited to:

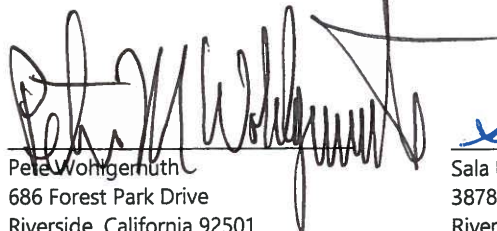
1. The Project conflicts with the pending \$2.5 million Northside Specific Plan.
2. The Project conflicts with long-held goals of property owners and residents of the surrounding community which have been city policy since 1991.
3. The Project violates current Riverside General Plan 2025 Northside Land Use Policy and Design Guidelines.
4. The Project violates the Riverside Municipal Code, among other issues it is not a "small-scale" warehouse.
5. The Project violates Federal, State and local laws governing historical and archeological sites, including the Public Resources Code 21084.1 requirement for a full EIR if actual or potential sites may be harmed.
6. The Initial Study is incomplete and the MND violates CEQA, a full EIR is required to correct these flaws.
7. The CEQA-required assessment of Cumulative Effects of pending development in the area of the Project--including the NSP, Roquet Ranch and others--is missing.
8. The NSP is required by CEQA to prepare an EIR, but it will serve no purpose if the Project is not also required to prepare a full EIR so the two documents can be evaluated together.
9. The property owners have no entitlement to a lot merger to facilitate a single large-scale warehouse; and as current zoning allows them to build separate small-scale BMP projects on the separate smaller-sized parcels.
10. The Planning Commission decision upheld a decision of the city's Zoning Administrator who is not independent but on the city's payroll and that decision was made in a regularly-scheduled, noticed meeting of the Developmental Review Committee, a permanent staff committee created by an ordinance of the Riverside City Council and therefore governed by the Ralph M. Brown Act, but was closed to the public in violation of Sections 54952 to 54953.

We attach our filing fee of \$2,529 to this letter.

Respectfully yours,



Karen Renfro, on behalf of
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