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7 Attorneys for Petitioner

8 **SUPERIOR COURT, STATE OF CALIFORNIA**  
9 **COUNTY OF RIVERSIDE**

10  
11 UNIVERSITY NEIGHBORHOOD  
12 ASSOCIATION, an unincorporated association,

13 Petitioner,

14 vs.

15 THE REGENTS OF THE UNIVERSITY OF  
16 CALIFORNIA, UNIVERSITY OF CALIFORNIA,  
RIVERSIDE, and DOES 1 through 10, inclusive,

17 Respondents.

Case No. **CVRI 21 05682**

**VERIFIED PETITION FOR WRIT OF  
MANDATE AND COMPLAINT**

(California Environmental Quality Act)

## INTRODUCTION

1  
2 1. This action challenges approvals by Respondents The Regents of the University of  
3 California and University of California, Riverside (collectively “University,” “UCR,” or  
4 “Respondent”) of the University’s 2021 Long Range Development Plan (“LRDP”) (“Project”), and  
5 associated Environmental Impact Report (“EIR”), Mitigation Monitoring and Reporting Program,  
6 CEQA Findings and Statement of Overriding Considerations, and the related failures to comply with  
7 the California Environmental Quality Act (“CEQA”), Pub. Res. Code § 21000, *et seq.*

8 2. Among other things, Respondent failed to consider the environmental impacts associated  
9 with the Project, failed to prepare and circulate required environmental analysis, and failed to consider  
10 and adopt feasible alternatives and mitigation.

11 3. Petitioner seeks alternative and peremptory writs of mandate declaring the University’s  
12 approvals invalid, and enjoining the University from taking steps to implement the approvals.

## PARTIES

13  
14 4. Petitioner University Neighborhood Association (“Petitioner”) is an unincorporated  
15 association which seeks to preserve and protect the quality of life in the area around the University of  
16 California, Riverside, including promoting responsible development, supporting public education, and  
17 minimizing the adverse effects of development on the community. Petitioner and its members have been  
18 injured as a result of Respondent’s actions. Petitioner and its members use, enjoy, and benefit from the  
19 resources affected by Respondent’s actions. Respondent’s actions adversely affect the recreational,  
20 aesthetic, scientific, environmental, and economic interests of Petitioner and of Petitioner’s members. The  
21 interests of Petitioner and Petitioner’s members have been and will continue to be adversely affected by  
22 Respondent’s unlawful actions. The relief sought in this Petition would redress Petitioner’s and  
23 Petitioner’s members’ injuries.

24 5. Respondent The Regents of the University of California is a public entity of the state of  
25 California, as specified by the Constitution and the laws of the State of California.

26 6. Respondent University of California, Riverside is a public entity of the State of California, as  
27 specified by the Constitution and the laws of the State of California.

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1 7. Petitioner does not know the true names or capacities of the persons or entities sued herein as  
2 Does 1 through 10, and therefore sues these respondents by such fictitious names. Petitioner will amend  
3 the Petition to set forth the names and capacities of said respondents along with appropriate charging  
4 allegations when the same have been ascertained.

### 5 **PROJECT DESCRIPTION AND HISTORY**

6 8. The Project site is at the University of California, Riverside, at 900 University Avenue,  
7 which is generally bounded on East Campus by the I-215/SR-60 on W. Blane Street and Watkins Drive,  
8 and on the West Campus by the I-215/SR-60 on University Avenue, Chicago Avenue, Le Conte Drive,  
9 and Canyon Crest Drive.

10 9. The 2021 LRDP for the University of California, Riverside is the guiding land use plan for  
11 the physical development of the UCR campus. The 2021 LRDP designates general types of development  
12 and land uses to facilitate new program initiatives and contains associated goals, objectives, and policies  
13 to guide future expansion of the UCR campus. The prior LRDP was approved in 2005.

14 10. The 2021 LRDP plans for an enrollment projection of 35,000 students through 2035 (an  
15 approximately 11,078 increase in students above the baseline 2018/2019 academic year), a faculty/staff  
16 population of 7,545 (an approximately 2,806 increase above the baseline 2018/2019 academic year), and  
17 estimates that up to a total of approximately 12.7 million gross square feet of building space  
18 (approximately 5.5 million net new gross square feet) is needed to support the projected growth.

19 11. On July 14, 2021, the University posted the 2021 LRDP and associated Draft EIR on their  
20 Planning, Design, and Construction website. Various Project materials, including the Draft EIR, were  
21 temporarily inaccessible on the University website for approximately two days. Accordingly, the  
22 comment period was extended from August 30, 2021 to September 3, 2021.

23 12. On September 3, 2021, Petitioner submitted comments to the University in opposition to the  
24 2021 LRDP and associated Draft EIR. Comments by Petitioner noted the Draft EIR's discussion of  
25 associated impacts was inadequate, including but not limited to, impacts to aesthetics, air quality, energy,  
26 greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, and  
27 traffic and transportation. Petitioners also asserted the Draft EIR failed to adequately consider cumulative  
28 impacts, including but not limited to, impacts to population and housing and recreation. Additionally,

1 Petitioner discussed the Draft EIR’s failure to adequately consider feasible mitigation measures relating to  
2 aesthetics, agricultural lands, biological resources, public services, and traffic and transportation.

3 Petitioner also noted the Draft EIR failed to adequately consider feasible alternatives. Petitioner also  
4 asserted the Draft EIR was inconsistent with various applicable policies, goals, and requirements,  
5 including but not limited to, the 2016 Air Quality Management Plan adopted by the County of  
6 Riverside, and the 2018 Annualized Regional Per Capita Energy Use Threshold adopted by the  
7 University. Lastly, Petitioner noted the Draft EIR was inconsistent with numerous University policies,  
8 goals, and requirements, including but not limited to, the UCR Physical Design Framework, the UCR  
9 Energy Use Threshold, the UCR Greenhouse Gas Emissions Threshold, and the UCR Housing Policy.

10 13. In November 2021, the University posted the Final EIR on their Planning, Design, and  
11 Construction website for review.

12 14. On November 12, 2021, Petitioner submitted comments to the University on the Final EIR  
13 associated with the 2021 LRDP. Petitioner’s comments noted the Final EIR contained very few changes  
14 from the Draft EIR, despite the many detailed comments from Petitioner and many other community  
15 members, including the City of Riverside, on the EIR’s failure to provide adequate analysis of the 2021  
16 LRDP’s various significant impacts. Petitioner also noted the Final EIR failed to provide adequate  
17 analysis of mitigation measures and alternatives to various significant impacts, including impacts to  
18 aesthetics, agricultural resources, air quality, cultural resources, noise, and transportation. Petitioner also  
19 noted the EIR acknowledged the Increased Student Housing Alternative was the environmentally superior  
20 alternative, yet neither the EIR nor Staff Report recommended its adoption. Finally, Petitioner asserted  
21 that as a result of these numerous failings, the proposed findings were inadequate and not supported by  
22 evidence.

23 15. On November 17, 2021 the University held a public hearing to consider approvals of the  
24 2021 LRDP and associated Final EIR. Despite numerous comments in opposition from Petitioner and  
25 many other members of the community, including the City of Riverside, the University approved the  
26 Project. Approvals included: 2021 Long Range Development Plan, certification of the associated Final  
27 EIR, adoption of a Mitigation Monitoring and Reporting Program, and adoption of CEQA Findings and a  
28 Statement of Overriding Considerations.

1 16. On November 18, 2021, the University filed a Notice of Determination.

2 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**  
3 **AND INADEQUATE REMEDIES AT LAW**

4 17. Petitioner has exhausted all available administrative remedies, and objections to the  
5 Project have been presented orally and in writing to the University, as required by Public Resources  
6 Code Section 21177. These include, but are not limited to, letters and oral comments presented during  
7 public hearings.

8 18. Petitioner has complied with the requirements of Public Resources Code Section 21167.5  
9 by mailing a written notice of commencement of this action to the University. A true and correct copy  
10 of that notice is attached hereto as Exhibit 1.

11 19. Petitioner has advised the University that Petitioner has elected to prepare the record of  
12 proceedings relevant to the approval of the Project, pursuant to Public Resources Code Section  
13 21167.6. A true and correct copy of that notice is attached hereto as Exhibit 2.

14 20. Petitioner has complied with Public Resources Code Section 21167.7 by filing a copy of  
15 the original petition with the California Attorney General. A true and correct copy of the notification  
16 is attached hereto as Exhibit 3.

17 21. Petitioner has no adequate remedy at law unless the Court grants the requested writ of  
18 mandate requiring the University to set aside its approval of the Project and the EIR. In the absence of  
19 such remedy, the University's approvals will remain in effect in violation of State law, and Petitioner  
20 will suffer irreparable harm because of the significant adverse environmental impacts generated by the  
21 Project.

22 **FIRST CAUSE OF ACTION**

23 **(FAILURE TO COMPLY WITH CEQA PROCEDURAL REQUIREMENTS)**

24 22. Petitioner incorporates by reference each of the allegations set forth in this Petition as if set  
25 forth herein in full.

26 23. The EIR fails to meet the requirements for an objective analysis of impacts.

27 24. Respondents failed to recirculate the EIR after substantial changes were made.

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1           25. Respondents failed to revise the EIR or prepare supplemental analysis after substantial  
2 changes were made to the Project.

3           26. Respondents failed to follow procedures mandated by CEQA, including but not limited to,  
4 failing to notify responsible agencies, failing to provide proper notice for public involvement, failing to  
5 provide adequate information in the EIR and allow adequate opportunity for public input, and failing to  
6 provide adequate access to Project-related documents.

7                               **SECOND CAUSE OF ACTION**  
8                               **(FAILURE TO ADEQUATELY CONSIDER ENVIRONMENTAL IMPACTS**  
9                               **AS REQUIRED BY CEQA)**

10          27. Petitioner incorporates by reference each of the allegations set forth in this Petition as if set  
11 forth herein in full.

12          28. Respondents' approval of the EIR constituted a prejudicial abuse of discretion in that the  
13 EIR is not in accord with CEQA, the CEQA Guidelines, and case law, but rather is legally inadequate and  
14 insufficient in numerous respects, including but not limited to, the following:

- 15           a.     The Project description is not stable and finite, and is unclear, inconsistent, skewed,  
16                inaccurate and incomplete in numerous respects;
- 17           b.     The EIR fails to discuss the existing environmental conditions in the affected area,  
18                including but not limited to, conditions on the ground and current planning conditions;
- 19           c.     The EIR fails to analyze adequately the significant adverse direct, indirect and  
20                cumulative effects of the Project, including but not limited to, the following:
  - 21                i.     Land use and community character impacts, including but not limited to, failing to  
22                       address physical deterioration of public parks, failing to address inconsistencies  
23                       with UCR Physical Design Framework requirements, failing to address  
24                       inconsistencies with applicable UCR Housing Policy requirements, failing to  
25                       address impacts to views, failing to address effects on the physical conditions as  
26                       they existed at the time of the environmental analysis, and failing to address  
27                       impacts to neighborhood and community character;
  - 28                       ii.  Visual quality and aesthetics impacts, including but not limited to, failing to  
                            address how the construction of new facilities, renovations of existing structures,

1 and other physical changes to the UCR campus will not degrade the visual  
2 character of the campus and surrounding areas, failing to address impacts to  
3 existing resources, failing to address impacts to neighboring homes, and failing to  
4 address impacts associated with lighting;

5 iii. Transportation and traffic impacts, including but not limited to, failing to analyze  
6 impacts associated with increase in student, faculty, and staff population, both on  
7 and off campus, on total vehicle miles traveled, failing to address the exacerbated  
8 conditions of roadways created by significant population growth on campus,  
9 failing to consider existing conditions, failing to address reasonably foreseeable  
10 impacts to traffic and traffic safety (including construction traffic, increased  
11 traffic, additional delays, narrow roads, overcrowded roads and intersections,  
12 additional accidents, excessive speeding, reduced access, and shifts in travel  
13 routes), failing to address impacts associated with existing failing streets and  
14 roads, failing to consider all roadways (including regionally significant arterials,  
15 freeways, ramps, and interchanges), failing to recognize the Project's impacts in  
16 relation to existing problems and failing streets and intersections, failing to  
17 address safety considerations associated with existing and Project traffic, using  
18 inaccurate baseline data, failing to assess impacts on alternative transportation  
19 (such as public transit, pedestrian and bicycle usage), failing to address the  
20 Project's impacts on area roads and intersections, using incorrect criteria to  
21 determine impacts, failing to address impacts associated with special events and  
22 special event traffic and parking, failing to consider sight distance, failing to  
23 consider impacts if mitigation is not fully funded, failing to address impacts to  
24 and from parking, failing to address impacts to pedestrian and bicycle traffic,  
25 relying upon unsupported models and data, using unsupported assumptions,  
26 failing to consider an appropriate share of mitigation for Project impacts, failing  
27 to analyze adequately impacts to intersections, and failing to analyze all affected  
28 areas;

- 1           iv.    Biological resource impacts, including but not limited to, failing to address impacts  
2           to areas of campus previously restored to natural state, failing to address impacts to  
3           open space, failing to address impacts to sensitive habitats and plant and animal  
4           species, failing to consider impacts of biological resources below the soil, failing to  
5           consider post-construction impacts, failing to consider impacts to non-native  
6           grasslands, failing to address impacts of mitigation proposed, failing to address  
7           impacts to wildlife corridors and wildlife movement, failing to address impacts  
8           associated with lighting, failing to protect important resources, relying upon old  
9           and inadequate survey data, lack of a synthesized project analysis, failing to  
10          provide a regional context, failing to address impacts to wetlands and wetland  
11          species, failing to address impacts associated with construction and dredging,  
12          failing to provide for adequate protection of riparian areas, and failing to address  
13          impacts to other species of concern;
- 14          v.    Climate Change impacts, including but not limited to, failing to adequately  
15          analyze or provide evidence the Project’s energy consumption will be consistent  
16          with the 2018 Annualized Regional Per Capita Energy Use Threshold, failing to  
17          address reasonably foreseeable impacts, failing to adequately account for current  
18          and future Greenhouse Gas emissions, failing to provide a sufficient greenhouse  
19          gas reduction plan, failing to meet AB 32 requirements, failing to ensure  
20          consistency with California Executive Order S-3-05, failing to use proper  
21          criteria to identify impacts to global warming, failing to comply with CEQA  
22          Guidelines Section 15064.4, and failing to consider potential health impacts,  
23          including cancer risk;
- 24          vi.   Human health and safety impacts, including but not limited to, impacts to area  
25          residents, toxins, groundwater contamination and soil contamination, impacts  
26          associated with cumulative exposures to several different sources of emissions,  
27          impacts associated with likely future emissions, impacts associated with loss of  
28          recreation, impacts associated with micro-climate changes, impacts associated



1 with increased fire risk, and impacts associated with exposures to sensitive  
2 individuals and other sensitive receptors;

3 vii. Hydrological and water quality impacts, including but not limited to, failing to  
4 address reasonably foreseeable impacts and the introduction of pollutants to  
5 groundwater and surface water, failing to discuss post-construction impacts, and  
6 failing to consider criteria for mitigation to impacts;

7 viii. Public services and facilities impacts, including but not limited to, failing to  
8 consider existing public facility conditions and supply, failing to consider  
9 reasonably foreseeable impacts, failing to address impacts to parks and recreation,  
10 police, paramedic, fire services, sewer systems, and water supply, failing to  
11 provide adequate facilities for police and fire protection, and failing to adopt  
12 adequate mitigation measures for significant impacts to public services and  
13 facilities;

14 ix. Water supply impacts, including but not limited to, failing to address the  
15 shortage of water in the area, failing to demonstrate an adequate water supply,  
16 failing to consider long-term water needs and supply, failing to provide an  
17 adequate showing that water supply would be available, and failing to analyze  
18 the impacts of the Project's use of and demand for water;

19 x. Air quality impacts, including but not limited to, failing to provide adequate  
20 analysis or evidence on how the Project will be consistent with the 2016 Air  
21 Quality Management Plan, failing to address reasonably foreseeable impacts  
22 (including the contribution of pollutants, grading related impacts, and the lack of  
23 attainment of air quality standards), failing to address construction impacts,  
24 failing to use proper criteria to identify impacts to air quality, and failing to  
25 consider potential health impacts, including cancer risk;

26 xi. Noise impacts, including but not limited to, failing to analyze impacts of  
27 construction noise and vibrations, failing to analyze impacts of permanent  
28 ambient noise from significant increase in student population, failing to consider

1 existing noise conditions, failing to address reasonably foreseeable impacts,  
2 failing to consider all likely sources of noise, failing to address impacts caused  
3 by proposed mitigation, failing to apply applicable standards appropriately,  
4 failing to consider likely future noise sources, and relying upon unsupported  
5 models and data;

6 xii. Historic and cultural resource impacts, including but not limited to, failing to  
7 consider all available resources, failing to consider the entire extent of the  
8 resource, relying upon improper methods of survey and analysis, failing to  
9 adequately analyze impacts, and inadequately disclosing resources and impacts;

10 xiii. Natural resource impacts, including but not limited to, failing to address soils  
11 and geology in the area;

12 xiv. Growth-related impacts, including growth inducement associated with the  
13 Project.

14 d. The EIR fails to consider adequately the cumulative impacts of the Project and other  
15 projects that are either existing, approved, planned, or reasonably foreseeable,  
16 including future projects and other developments located both within and outside of  
17 Respondents' physical boundaries;

18 e. The EIR illegally defers analysis of reasonably foreseeable impacts;

19 f. The EIR improperly segments the Project, piecemealing or otherwise avoiding  
20 reasonably foreseeable impacts, and separately focusing on isolated parts of the  
21 whole;

22 g. The EIR fails to consider adequately impacts that narrow the range of beneficial  
23 uses of the environment, in violation of Section 15126(e) of the CEQA Guidelines;

24 h. The EIR fails to address adequately impacts that cannot be mitigated, including but  
25 not limited to, describing their implications and the reasons why the Project is being  
26 proposed notwithstanding its adverse effects;

27 i. The EIR fails to consider adequately the significant irreversible effects of the  
28 Project, in violation of Section 15126(f) of the CEQA Guidelines, including but not

1 limited to, traffic circulation impacts; reduction in visual quality; increased erosion  
2 rates and the potential to exacerbate the loss of native top soils due to grading,  
3 compaction, and construction of impervious surfaces; and the change in the existing  
4 community character;

- 5 j. The EIR impermissibly defines the Project objectives in a way to attempt to  
6 preclude discussion of reasonable alternatives;
- 7 k. The EIR fails to analyze adequately a reasonable range of alternatives to the Project,  
8 which could reduce substantially Project related impacts, and to evaluate the  
9 comparative merits of the alternatives;
- 10 l. The EIR fails to analyze adequately feasible mitigation measures, fails to provide  
11 for mitigation for each environmental effect, illegally relies upon deferred  
12 mitigation measures, and fails to provide for effective and enforceable mitigation;
- 13 m. The EIR fails to adopt a proper baseline, including presuming that development of the  
14 area is imminent, ignoring on-the-ground conditions, and using the previously  
15 approved LRDP as a baseline despite its inadequacies.

16 29. Respondents failed to respond adequately to public comments.

17 **THIRD CAUSE OF ACTION**  
18 **(FAILURE TO ADOPT FEASIBLE MITIGATION MEASURES**  
19 **AND ALTERNATIVES REQUIRED BY CEQA)**

20 30. Petitioner incorporates by reference each of the allegations set forth in this Petition as if set  
21 forth herein in full.

22 31. Respondents failed to consider and adopt feasible alternatives, including but not limited to,  
23 alternatives requiring less impacts that meet some or all of the Project objectives.

24 32. Respondents defined the Project and its objections too narrowly, resulting in a narrowing of  
25 the consideration of alternatives.

26 33. Respondents failed to adopt the environmentally superior alternative.

27 34. Respondents failed to consider and adopt feasible mitigation measures, failed to mitigate for  
28 each environmental effect, illegally deferred mitigation, and failed to provide for effective and enforceable  
mitigation.

1 **FOURTH CAUSE OF ACTION**  
2 **(FAILURE TO ADOPT FINDINGS THAT ARE**  
3 **SUPPORTED BY EVIDENCE IN THE RECORD)**

3 35. Petitioner incorporates by reference each of the allegations set forth in this Petition as if set  
4 forth herein in full.

5 36. Respondents failed to adopt findings that are supported by substantial evidence in the  
6 record. Among other things, the findings assert that the Project's mitigation measures adequately  
7 reduce impacts below a level of significance without adequate evidence in the record to support such  
8 findings, and the findings assert that the Project will be consistent with the 2016 Air Quality  
9 Management Plan adopted by the County of Riverside, the 2018 Annualized Regional Per Capita  
10 Energy Use Threshold adopted by the University, and other requirements where there is insufficient  
11 evidence to support such consistency findings.

12 **FIFTH CAUSE OF ACTION**  
13 **(FAILURE TO ADOPT A STATEMENT OF OVERRIDING CONSIDERATIONS**  
14 **THAT IS SUPPORTED BY EVIDENCE IN THE RECORD)**

14 37. Petitioner incorporates by reference each of the allegations set forth in this Petition as if set  
15 forth herein in full.

16 38. Respondents failed to adopt a Statement of Overriding Considerations that is supported by  
17 substantial evidence in the record despite the Project's significant environmental impacts.

18 **SIXTH CAUSE OF ACTION**  
19 **(VIOLATION OF POLICIES, REQUIREMENTS, AND GOALS)**

20 39. Petitioner incorporates by reference each of the allegations set forth in this Petition as if set  
21 forth herein in full.

22 40. The Project violates and is inconsistent with the applicable Policies, Requirements, and  
23 Goals, including:

- 24 a. UCR Physical Design Framework, including but not limited to, failing to provide  
25 adequate analysis and evidence the Project will result in less than significant impacts  
26 to neighborhood and community character in relation to aesthetics;

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- C. For costs of suit;
- D. For reasonable attorneys' fees; and
- E. For such other and further relief as the Court deems just and proper.

DATED: December 16, 2021

Respectfully submitted,

**DELANO & DELANO**

By:  \_\_\_\_\_  
Isabela Rodriguez  
Attorney for Petitioner

1 **VERIFICATION**

2 I have read the foregoing Verified Petition for Writ of Mandate and Complaint and know its  
3 contents.

4 I am a party to this action. The matters stated in it are true of my own knowledge except as  
5 to those matters which are stated on information and belief, and as to those matters I believe  
6 them to be true.

7 X I am an officer of University Neighborhood Association, a party to this action, and am  
8 authorized to make this verification for and on its behalf, and I make this verification for that  
9 reason. I have read the foregoing document(s). I am informed and believe and on that  
10 ground allege that the matters stated in it are true.

11  
12 I am one of the attorneys for \_\_\_\_\_ a party to this action. Such party is absent from  
13 the County where such attorneys have their offices, and I make this verification for and on  
14 behalf of that party for that reason. I have read the foregoing document(s). I am informed  
15 and believe that on that ground allege that the matters stated in it are true.

16  
17 Executed on December 16, 2021 at Riverside, California.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
19 true and correct.

20 

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28  
Kevin Dawson

EXHIBIT 1





# DELANO & DELANO

December 15, 2021

Anne Shaw  
Office of the Secretary and Chief of Staff  
The Regents of the University of California  
1111 Franklin Street, 12<sup>th</sup> Floor  
Oakland, CA 94607

Office of the Chancellor  
University of California, Riverside  
4108 Hinderaker Hall  
Riverside, CA 92521

Re: Notice of Intention to Commence Action Under the California Environmental Quality Act

Dear University of California:

Please take notice that University Neighborhood Association intends to commence an action in California Superior Court, alleging, among other things, violations of the California Environmental Quality Act ("CEQA") against the University of California to challenge the approvals of the 2021 Long Range Development Plan ("Project"), and associated Environmental Impact Report, Mitigation Monitoring and Reporting Program and CEQA Findings and Statement of Overriding Considerations. Among other things, the Petition will seek to vacate the approvals of the Project, and to enjoin the University from taking any further steps to implement the approvals.

If the University would like to discuss these concerns and their possible resolution, please contact the undersigned immediately. Thank you for your attention to this matter.

Sincerely,

---

Isabela Rodriguez, Esq.



1 Everett L. DeLano, III (Calif. Bar No. 162608)  
2 Isabela Rodriguez (Calif. Bar No. 336015)  
3 DeLano & DeLano  
4 104 W. Grand Avenue, Suite A  
5 Escondido, California 92025  
6 Tel: (760) 741-1200  
7 Fax: (760) 741-1212

8 Attorneys for Petitioner

9 **SUPERIOR COURT, STATE OF CALIFORNIA**  
10 **COUNTY OF RIVERSIDE**

11 UNIVERSITY NEIGHBORHOOD  
12 ASSOCIATION, an unincorporated  
13 association,

14 Petitioner,

15 vs.

16 THE REGENTS OF THE UNIVERSITY OF  
17 CALIFORNIA, UNIVERSITY OF  
18 CALIFORNIA, RIVERSIDE, and DOES 1  
19 through 10, inclusive,

20 Respondents.

Case No.

**NOTICE OF ELECTION TO PREPARE  
ADMINISTRATIVE RECORD**

(California Environmental Quality Act)

21 By this notice, Petitioner gives notice that Petitioner elects to prepare the administrative record  
22 in the above-entitled action.

23 DATED: December 16, 2021

DeLano & DeLano

24  
25 By: 

26 Everett L. DeLano III  
27 Isabela Rodriguez  
28 Attorneys for Petitioner



1 **PROOF OF SERVICE**

2 *UNIVERSITY NEIGHBORHOOD ASSOCIATION v. THE REGENTS OF THE UNIVERSITY OF*  
3 *CALIFORNIA, UNIVERSITY OF CALIFORNIA, RIVERSIDE, et al.*


4 I, the undersigned, declare:

- 5 1. I am over the age of 18 years and not a party to this action. I am employed in the county of San
- 6 Diego, California, in which county the within-mentioned service occurred. My business address
- 7 is 104 W. Grand Avenue, Suite A, Escondido, CA 92025.
- 8 2. I am familiar with this office's normal business practice for collection and processing of
- 9 correspondence for mailing with the U.S. Postal Service. That practice is to deposit
- 10 correspondence with the U.S. Postal Service the same day as the day of collection in the
- 11 ordinary course of business.
- 12 3. On December 16, 2021, I served a copy of **VERIFIED PETITION FOR WRIT OF**
- 13 **MANDATE AND COMPLAINT** to the following party by the method described above:

12 California Attorney General  
 13 Service Deputy  
 14 300 South Spring St.  
 Los Angeles, CA 90013

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
16 true and correct.

17 Dated 16<sup>th</sup> day of December, 2021 at Escondido, California,

18   
 19 \_\_\_\_\_  
 20 Cindy Millican