



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and Mail

December 19, 2017

Mr. Chris Lopez
Development Specialist, Special Projects
Community Development commission, County of Los Angeles
700 West Main Street
Alhambra, CA 91801
CLopez@labtc.org

**Re: Vermont Corridor Project – Draft Environmental Impact Report,
(SCH No. 2017051013)**

Dear Mr. Lopez:

I am writing on behalf of **Laborers International Union of North America, Local Union No. 300** and its members living in the County of Los Angeles (collectively “LIUNA” or “Commenters”) regarding the Draft Environmental Impact Report (“DEIR”) prepared for the Vermont Corridor Project (SCH No. 2017051013) (“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. Commenters request that the County of Los Angeles 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).

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Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Drury".

Richard Drury

Comment Letter No. 11

Lozeau Drury LLP
Richard Drury
on behalf of Labors International Union of North America, Local Union No. 300
410 12th Street, Suite 250
Oakland, CA 94607
December 19, 2017

Response to Comment 11-1

The comment states the letter is written on behalf of the Labors International Union of North America, Local Union No. 300 (LIUNA), and its Los Angeles County members. The comment claims that the Draft EIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impact, but provides no specifics. The comment suggests that the County should address the shortcomings in a revised Draft EIR and recirculate the revised Draft EIR prior to approval. The comment states it reserves the right to supplement the comments during the review of the Final EIR for the Project and at the public hearings. The comment does not identify any specific shortcomings of the Draft EIR analysis or mitigation measures, and no specific response is therefore possible or required. Furthermore, and contrary to the allegation in this comment, the Draft EIR complied fully with all of CEQA's requirements. The comment presents no substantial evidence to the contrary about any specific impact area. As provided in Section 15064(f)(5), unsubstantiated opinion or narrative does not constitute substantial evidence. Since the commenter provides no substantial evidence regarding the alleged inadequacy of the Draft EIR, the claims contained in the comment letter would provide no basis for changes to the Draft EIR.

The general allegations in this comment will be forwarded to the decision-makers for consideration.