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*Via Email and Mail*

March 22, 2017

E. Shearer-Nguyen, Environmental Planner  
 City of San Diego Development Services Center  
 1222 First Avenue, MS 501  
 San Diego, CA 92101  
 Email: [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov)

**Re: Merge 56 (aka Merge 56 Development), Project Number 360009  
 (SCH No. 2014071065)**

Dear Ms. Shearer-Nguyen:

I am writing on behalf of **Laborers International Union of North America, Local Union No. 89** and its members living in the City of San Diego (collectively "LIUNA" or "Commenters") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Merge 56 (aka Merge 56 Development), Project Number 360009 (SCH No. 2014071065) ("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 City of San Diego 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).

Sincerely,

Richard Drury

M1 The Draft EIR thoroughly analyzed and disclosed the potentially significant project impacts consistent with CEQA's information disclosure mandates. As the comment does not offer any specifics, no further response to this comment is required by CEQA.

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