



T 510.836.4200  
F 510.836.4205

410 12th Street, Suite 250  
Oakland, Ca 94607

www.lozeaudrury.com  
michael@lozeaudrury.com

*Via Email and U.S. Mail*

January 4, 2019

Matt VanOosten, Project Planner  
Community Development  
City of Mountain View  
500 Castro Street, 1st Floor  
Mountain View, CA 94039-7540  
[matthew.vanoosten@mountainview.gov](mailto:matthew.vanoosten@mountainview.gov)

Re: **Comment on Draft Environmental Impact Report for 1696-1758 Villa Street,  
aka PL-2017-354 for the Prometheus Real Estate Group, SCH 2017122039**

Dear Mr. VanOosten,

I am writing on behalf of Laborers International Union of North America, Local Union No. 270 and its members living in and around the City of Mountain View ("LIUNA") regarding the Draft Environmental Impact Report ("DEIR") prepared for the project known as 1696-1758 Villa Street, aka PL-2017-354 for the Prometheus Real Estate Group, SCH 2017122039, including all actions related or referring to the request for a General Plan Amendment from Medium-Density Residential and Low-Density Residential to High Density Residential, a Zoning Map Amendment from R3-2 and R1 to P-17, a Precise Plan Amendment to the Villa-Mariposa Precise Plan, a Development Review Permit to construct a 226-unit apartment complex over two levels of underground parking to replace a 16-unit apartment building and 3 single family homes, and a Heritage Tree Removal permit to remove 26 Heritage trees located at 1696-1758 Villa Street on APNs: 154-02-001, 154-02-002, and 154-03-019 to 154-03-022 in the City of Mountain View ("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. LIUNA requests that the Planning Division 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,

A handwritten signature in blue ink that reads "Michael R. Lozeau".

Michael R. Lozeau  
Lozeau | Drury LLP