



T 510.836.4200  
F 510.836.4205

1939 Harrison Street, Ste. 150  
Oakland, CA 94612

www.lozeaudrury.com  
richard@lozeaudrury.com

*Via Email and U.S. Mail*

May 14, 2019

William Lamborn, Planner  
Major Projects Section  
Department of City Planning  
City of Los Angeles  
221 N. Figueroa Street Suite 1350  
Los Angeles, CA 90012  
[William.lamborn@lacity.org](mailto:William.lamborn@lacity.org)

Vincent P. Bertoni, Director of Planning  
Department of City Planning  
City of Los Angeles  
221 N. Figueroa Street Suite 1350  
Los Angeles, CA 90012  
[Vince.bertoni@lacity.org](mailto:Vince.bertoni@lacity.org)

Holly L. Wolcott, City Clerk  
City Clerk's Office  
City of Los Angeles  
200 North Spring Street, Room 360  
Los Angeles, CA 90012  
[cityclerk@lacity.org](mailto:cityclerk@lacity.org)

Re: Comment on Draft Environmental Impact Report, Times Mirror Square Project (aka VTT74761, ENV-2016-4676-EIR, CPC-2016-4675-TDR-VCU-MCUP, and SCH2017061083)

Dear Mr. Lamborn, Mr. Bertoni, and Ms. Wolcott:

I am writing on behalf of **Supporters Alliance For Environmental Responsibility ("SAFER")**, regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as Times Mirror Square Project (aka VTT74761, ENV-2016-4676-EIR, CPC-2016-4675-TDR-VCU-MCUP, and SCH2017061083), including all actions related or referring to the proposed demolition of two buildings, preservation/reuse of three existing buildings and construction of two high-rise towers containing 1,127 residential units and 34,572 square feet of commercial floor area above a five story parking podium located at 121, 145, 147 S. Spring Street; 100, 102, 106, 108, 110, 118, 120, 124, 126, 128, 130, 140, 142 S. Broadway; 202, 212, 214, 220, 224, 228, 230, 234 W. 1st Street; 205, 211, 221 W. 2nd Street in the City of Los Angeles ("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. SAFER request that the Department of City Planning address these shortcomings in

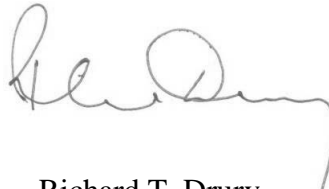
May 14, 2019

Comment on Draft Environmental Impact Report, Times Mirror Square Project (aka aka VTT74761, ENV-2016-4676-EIR, CPC-2016-4675-TDR-VCU-MCUP, and SCH2017061083)

Page 2 of 2

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 black ink, appearing to read "Richard T. Drury". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Richard T. Drury