

## **Justification/Reason for Appeal**

### **College Station Project**

Vesting Tentative Tract Map No. VTT-74200-1A (& CEQA No. ENV-2012-2055-EIR)

129-135 W. College Street and 924 N. Spring Street, Los Angeles, California 90012 (Project Site)

**REASON FOR THE APPEAL:** The Environmental Impact Report (“EIR”) prepared for the College Station Project (CEQA No. ENV-2012-2055-EIR) (“Project”) fails to comply with the California Environmental Quality Act (CEQA).

**SPECIFICALLY THE POINTS IN ISSUE:** The EIR fails to adequately analyze environmental impacts of the Project, fails to adequately describe the environmental setting of the Project, and fails to propose all feasible mitigation measures and alternatives to reduce Project impacts. Specifically, the EIR found potentially significant impacts in the following categories: noise, public services, transportation and traffic. It also found potentially significant impacts for one of the mandatory findings of significance required by CEQA. Appellant also believes the Project will have significant air quality impacts as well as traffic impacts. These potentially significant impacts must be analyzed in an EIR.

**HOW YOU ARE AGGREIVED BY THE DECISION:** Members of appellants Laborers International Union of North America (LIUNA) Local 300 live in the vicinity of the proposed Project. They breathe the air, suffer traffic congestion, and will suffer other environmental impacts of the Project unless it is properly mitigated. Construction workers, such as the members of LIUNA Local 300, will be directly affected by soil contamination, improperly controlled construction equipment, and other risks during Project construction.

**WHY YOU BELIEVE THE DECISION-MAKER ERRED OR ABUSED THEIR DISCRETION:** The City Planning Commission approved the EIR, the Statement of Overriding Consequences, the Mitigation Monitoring Program, and the Vesting Tentative Tract No. VTT-74200-1A for the Project despite the fact that the EIR fails to comply with CEQA.