UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 21, 2006

Mr. Morris Angell
Portfolio Management Division Capital Investment Branch (9PTC)
U.S. General Services Administration
450 Golden Gate Avenue
San Francisco, CA 94102

Subject: EPA Comments on the Draft Environmental Impact Statement (DEIS) for the Los Angeles FBI Federal Building (CEQ# 60067)

Dear Mr. Angell:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The U.S. General Services Administration (GSA) is proposing the consolidation of the FBI Field Office Headquarters and 11 other separate leased locations into one single location. While EPA recognizes the benefit of consolidating FBI offices, we are concerned about the analysis of alternatives and potential traffic impacts as a result of the project. GSA has not selected a preferred alternative for this project. While we have more substantial concerns about the implementation of Alternative 1 when compared to Alternative 2, we have rated both action alternatives as Environmental Concerns, Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions").

On the site selected, the two proposed alternatives vary greatly in their associated environmental impacts. We note that Alternative 1 will have long-term significant impacts to traffic in the area, which is already one of the busiest intersection areas in the country. City officials have expressed concern with the increase in traffic from this project. Los Angeles County is in nonattainment for particulate matter less than 10 microns in diameter (PM10) and ozone (p. 4-25). Therefore, it is important to reduce traffic and associated air quality impacts from this project as much as possible. In addition, Alternative 2 will have fewer impacts on energy consumption, solid waste generation, and water consumption when compared to Alternative 1.

On a larger scale, we are concerned that there is not enough information in the DEIS to support the determination that another project site is not feasible. While page 2-2 notes that 35

potential sites were identified, only one site is brought forward for evaluation. The site evaluation method outlined on page 2-2 appears restrictive and should be clarified in the Final EIS. For example, it is unclear why 10 contiguous buildable acres are necessary for this project. Additionally, the FBI mission requirements for buildings, referenced on page 2-2, are not listed or described.

Although Appendix B includes a list of additional sites that were considered, the information seems incomplete to determine that a few of the sites are infeasible. For example, there are other sites that could allow development of up to 9.6 acres, but these have been ruled out for size limitations or speculation about preservation needs, transportation needs, or potential remediation requirements (such as South Central Ave., Bauchet St., and South Wilmington Ave.). Until specific information is known about these alternatives that determines them infeasible, they must be analyzed more fully in the Final EIS. As page 4-51 notes, there are 72 proposed projects in the surrounding three mile area. Therefore, alternative sites that could lead to less traffic impacts or other cumulative impacts should be analyzed fully.

We appreciate the opportunity to review this DEIS. Please send two copies of the Final EIS to the address above (Mail Code: CED-2) at the same time it is officially filed with EPA Headquarters. If you have any questions, please call me at (415) 972-3988 or Summer Allen, the project reviewer, at (415) 972-3847.

Sincerely,

/S/
Duane James, Manager
Environmental Review Office

Main ID# 4357

Enclosures: Summary of Rating Definitions