

1 **FEDERAL BUILDING COALITION**

2
3 1557 Westwood Blvd. #235, Los Angeles, CA 90024
4 Tel. 310-470-4522
5 Fax 310-470-9944

6
7 **WWW.FEDERALBUILDING.ORG**

8
9
10 April 24, 2006

11
12 Mr. Morris Angell
13 Regional Environmental Quality Advisor and Senior Asset Manager
14 Portfolio Management Division Capital Investment Branch (9PTC)
15 US General Services Administration
16 450 Golden Gate Avenue
17 San Francisco, CA 94102

18
19 Email: morris.angell@gsa.gov

20
21 **RE: DEIS Environmental Impact Statement, US GSA, Los Angeles FBI Federal Building**

22
23 Dear Mr. Angell:

24
25 The Federal Building site in Westwood, Los Angeles, was deeded in 1888 to the War
26 Department as a Soldiers Home. It is shown on the current Los Angeles Assessor's map as
27 "Soldiers Home" (below). **We therefore ask that this land be used exclusively for direct**
28 **services to Veterans. The federal government must not betray its commitment to our**
29 **nation's veterans.**

30
31 The draft EIS is so fatally flawed (as discussed in detail below) that a newly prepared draft
32 (not final) EIS must be prepared for this project (a) that appropriately analyzes the traffic,
33 security, open space and other substantial impact of the proposed project; and (b) states a
34 proper methodology for genuinely identifying and consistently analyzing potential alternative
35 sites within the broader metropolitan Los Angeles area.

36
37 Because the Federal Building site is in the immediate proximity of other large federal land
38 holdings (the VA national cemetery, the VA campus, (including the medical center south of
39 Wilshire Boulevard and the adjacent area north of Wilshire Boulevard) and the Army Reserve,
40 the Federal Building site must be considered in the context of a Federal Land Use Master Plan
41 for all of these important federal properties that were deeded for the exclusive benefit of
42 and use by our veterans.

43
44 On April 19, 2006, a motion was introduced to the Los Angeles City Council (attached)
45 opposing the Westwood site for the FBI Headquarters; and requesting the preparation of a
46 Federal Land Use Master Plan for all three Federal properties in the area: the VA, Federal
47 Building, and the Army Reserve. Under Executive Order 12072 Section 1-203(c) GSA must
48 consider objections of local government officials to a proposed selection site. They are now

FEDERAL BUILDING COALITION

1 firmly on record in opposition to the Westwood Federal Building site for an FBI Regional
2 Headquarters.

3
4 This letter is submitted on behalf of the Federal Building Coalition, representing over
5 300,000 residents from the greater Bel Air, Brentwood, Westwood, Pacific Palisades, West
6 Los Angeles and San Fernando Valley areas. As of this date, the coalition's member's include:
7

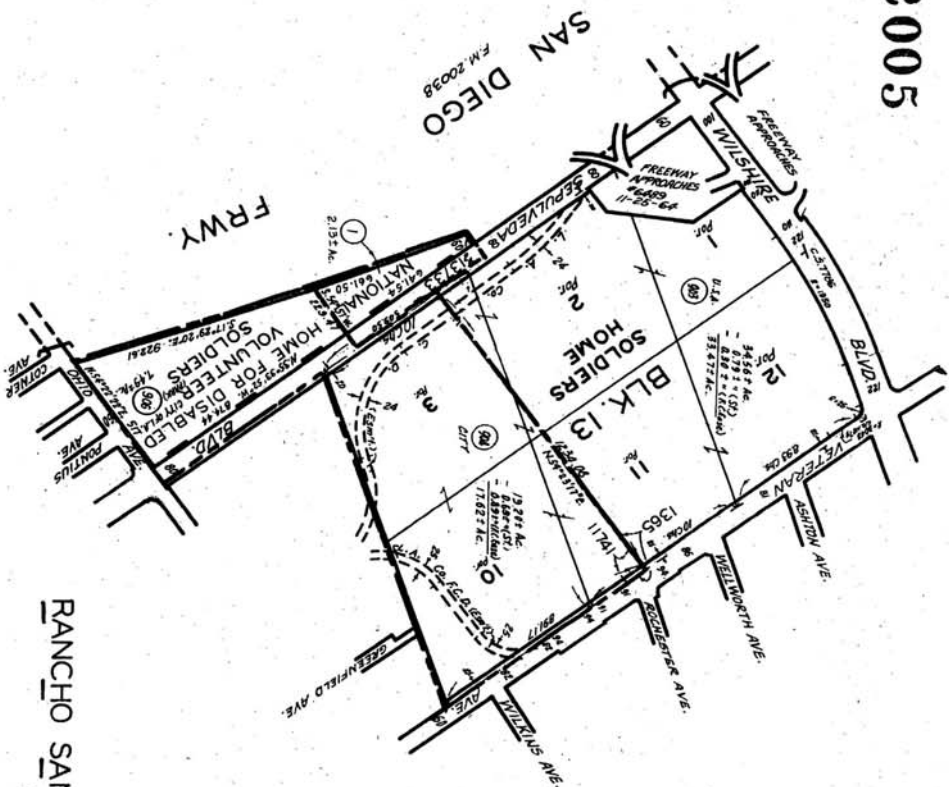
8 Bel Air Association
9 Bel Air Beverly Crest Neighborhood Council
10 Beverly Glen Homeowners Association
11 Brentwood Glen Homeowners Association
12 Brentwood Hills Homeowners Association
13 Brentwood Homeowners Association
14 Brentwood Community Council
15 Coalition of Homeowner Associations - Council District 5
16 Federation of Hillside and Canyon Associations
17 Friends of Westwood
18 Holmby Westwood Property Owners Association
19 Mandeville Canyon Homeowners Association
20 Pacific Palisades Community Council
21 Santa Monica Canyon Property Owners Association
22 Save Westwood Village
23 South Brentwood Homeowners Association
24 Sullivan Canyon Homeowners Association
25 Tract 7260
26 Veterans Park Conservancy
27 West Los Angeles Chamber of Commerce
28 West Los Angeles Neighborhood Council
29 Westside Neighborhood Council
30 Westwood Gardens Civic Association
31 Westwood Homeowners
32 Westwood Hills POA
33 Westwood South of Santa Monica
34 Upper Mandeville Canyon
35

36 We incorporate by reference all other testimony. More information on the Federal Building
37 Coalition can be found on its website: www.federalbuilding.org.

FEDERAL BUILDING COALITION

17
400'

2005



RANCHO SAN VICENTE Y SANTA MONICA
P. 3 - 30 - 31

SUBDIVISION OF

RANCHO SAN JOSE DE BUENOS AYRES

M. R. 26-19-25

CODE
1365
1741
13733

FOR PREV. ASSMT. SEE: 4324-17

REVISED
10-21-80
3-23-80
3-4-81
2/20/84
1/29/85
5/24/86
3/29/87

FEDERAL BUILDING COALITION

SUMMARY

Some of the key reasons why the GSA must resubmit a new draft EIS (and schedule a new hearing on that draft) are the following:

- **Alternative 2 is not analyzed and is based on false information.** All three alternatives mentioned in the DEIS (Alternatives 1 and 2 and the so-called “No Action” Alternative 3) greatly increase the number of federal employees in the study area, resulting in major traffic impacts. NEPA requires the GSA to consider direct and indirect effects of the project. The GSA sets up Alternative 1 as a red herring and then devotes less than one page to Alternative 2 in the more than 1,224 pages in the DEIS and related Appendices, simply stating their conclusion that Alternative 2 will have a “beneficial” impact. The GSA includes no analysis of Alternative 2 in the dEIS, even though such an analysis is required by NEPA. Even the scant information regarding Alternative 2 in the DEIS is based on false information because it fails to disclose and analyze the number of federal employees at the site and within the study area.
- **The so-called “No Action” Alternative is not analyzed adequately, is based on incomplete information and is presented in a misleading manner.** NEPA requires that the NO Action Alternative be based on doing nothing - “the alternative where current conditions and trends are projected into the future without another proposed action” (40 CFR 1502.14(d)). Improperly, the NO Action Alternative affirmatively adds 815 employees to the existing Federal Building and an unidentified number of federal employees relocated to other buildings in the study area.
- **Security issues are not analyzed.** There is no analysis of the impact of disruptive and dangerous events (terror attacks, 63 bomb scares since 2001, or increased protest activity) on the area surrounding the proposed FBI regional headquarters. Furthermore, the traffic conditions in the area surrounding the proposed site do not allow the FBI to deploy in an emergency and further degrade response times of fire and police personnel (which are already 33-40 percent below current citywide standards according to DEIS p. 4-31 and p. A-11B).
- **The GSA’s so-called alternative site analysis (Appendix B) is grossly inadequate.** At the eleventh hour, the GSA substantially narrowed the boundaries it would consider for alternative sites. Their effort to identify alternative sites did not comply with NEPA, let alone follow common sense. It is clear that the redrawn boundary definitions and added site requirements (such as “*a prime commercial office district with attractive prestigious professional surroundings*” and “*commensurate with the status of the government agency,*” were established so as to require the conclusion that the existing Federal Building site could be the only acceptable site. This is further evidenced by the fact that the GSA did not state any methodology for identifying or analyzing alternative sites for the project, let alone engage qualified professionals to identify and analyzed alternative sites (in contrast to their hiring professionals to prepare the DEIS, to manage the scoping and meeting process and to conduct their traffic study). In fact, some of the very reasons to reject sites also apply to the Federal Building site!

FEDERAL BUILDING COALITION

- 1
2 ● **The traffic study included in the DEIS is deficient and unsubstantiated.** The traffic
3 study was based on a flawed survey in which the number of visitors leaving the facility
4 exceeded the number that arrived the same day by several hundred, and the GSA
5 “estimated” the percentage of headcount that were FBI and non-FBI personnel and
6 visitors. There is no discussion on how the survey data were used to derive the trip
7 generation rate of 2.2 trips per FBI employee. The traffic study was based on an
8 arbitrary, unsubstantiated trip generate rate with no comparison to generally accepted
9 rates used in proper traffic studies. There is no analysis of current or projected traffic
10 at the Wilshire on/off ramps to the I-405 Freeway, which is the “driveway” to the
11 proposed site. There is no analysis of the traffic impact of terror events, bomb scares
12 and increasingly frequent protests at the proposed site. The only material conclusion
13 of the traffic study that is documented is that there will be stunning adverse impacts at
14 62 of the 70 traffic intersections studied which will reach the most negative rating
15 levels and cannot be mitigated.
- 16
17 ● **There must be a protection against any expansion of 1252 headcount on the current**
18 **Westwood Federal Building site.** If the FBI, or any other federal agency needs to
19 expand, GSA must find an alternative site outside the study area. There is no
20 infrastructure available to service federal expansion in Westwood and Brentwood.
- 21
22 ● **The DEIS did not analyze the following issues:**
 - 23
24 ● The impact of the build-out of adjacent VA lands and the Army Reserve (see
25 attached ad for land swap auction).
 - 26
27 ● The impact of terror events, bomb scares and increasing protests on local law
28 enforcement and fire resources.
- 29
30 ● **The DEIS did not even mention, let alone analyze, the following issues:**
 - 31
32 ● Plans for a proposed mass transit rail line running under Wilshire Boulevard
33 adjacent to the Federal Building site (see page B-2 of the DEIS - “to minimize
34 the strategic target value, the site cannot be located or lie adjacent to a
35 railroad right of way”).
 - 36
37 ● The potential for a terror attack launched from the elevated I-405 Freeway
38 adjacent to the proposed site. In contradiction, the GSA rejected some
39 alternative sites because of their proximity to elevated freeways (see page B-4
40 of the DEIS: “unacceptable condition for the safety and security of employees
41 and operations”).
 - 42
43 ● The impact of the fact that adjacent parcels have been mapped by the City of
44 Los Angeles as methane gas hazard areas.

45
46 The following are our detailed comments on the DEIS:

FEDERAL BUILDING COALITION

- 1
2 ● The No Action Alternative does not comply with federal law. NEPA requires that the
3 No Action Alternative do nothing. 40 CFR 1502.14(d) defines the No Action Alternative
4 as “The alternative where current conditions and trends are projected into the future
5 without another proposed action.”
6

7 But the No Action Alternative (3) shown in Table ES-1, Summary of Alternatives, p. ES-
8 4, adds 815 employees to the current Federal Building. This does not comply with CEQ
9 requirements. The number of employees under the No Action Alternative should be
10 shown as 1252, the current number of employees on site, NOT 2067.
11

12 The No Action Alternative (page 2-1/2-13, Lines 17-19) does not mention adding staff to
13 current building. Internal inconsistency is a defect and confusing. Does the No Action
14 Alternative propose to add staff from current levels or not?
15

- 16 ● **Scoping.** Several critical issues were raised during scoping that are acknowledged in
17 the summary of scoping, but never analyzed, as requested. These include but are not
18 limited to the following: DEIS page 2-12, Lines 36-39, **security concerns.** Security
19 concerns due to bomb scares, protests, and terror threats were requested to be
20 analyzed as part of the DEIS. They were not. A revised DEIS must be prepared that
21 thoroughly analyzes these concerns.
22
- 23 ● **Groups, Not Individuals.** Page 2-10, Lines 29-30, is incorrect. Letters were provided
24 primarily by organizations, each representing thousands of residents. Thus to claim
25 that letters were received from 24 individuals, is misleading.
26
- 27 ● **Deis Is Speculative and Conclusionary and Not Based on Information in the Record.**
28 Therefore the GSA is acting in an arbitrary and capricious manner in violation of due
29 process requirements of the US Constitution and the Federal Administrative Procedure
30 Act.
31
- 32 ● **Page Numbers Were Incorrect and Confusing.** There were two Section 2. This was
33 very confusing.
34
- 35 ● **Traffic Appendices Were Not Published with the Deis.** Even when the CD was mailed,
36 some contained no data. Key information was not provided in the CD, such as how the
37 trip generation rate was calculated.
38
- 39 ● **Provide Written Responses to Letters Received in Response to Scoping and Notice of**
40 **Intention.**
41
42
43

44 I. LAND USE

- 45
46 1. Table ES-2 claims no adverse land use impact when in fact open space

FEDERAL BUILDING COALITION

1 impacts are severe. The proposed hardened target (blast-proof construction) is
2 incompatible with adjacent park, homes, and high rise office buildings. Indeed,
3 protests already block access to the garage of the office building immediately
4 east of the Federal Building. A larger federal presence will generate even more
5 adverse impacts on adjacent properties.
6

- 7 2. **Any use other than direct services to Veterans represents an adverse land**
8 **use impact.** Since this property was deeded for a Soldiers' Home, the proposed
9 use is inconsistent with the original deed.
10
- 11 3. **There is no analysis of reducing public assembly space on traffic.** By
12 enlarging/increasing the federal structures and enclosing them for security
13 purposes, protests are more likely to spill from the sidewalk to the street,
14 thereby disrupting traffic even more than current disruptions, which were
15 identified in the Scoping process as a subject for analysis, but never addressed
16 in the DEIS.
17
- 18 4. **There is no analysis of increased security and terrorist threats due to a larger**
19 **federal presence, including blast impacts on adjacent structures and civilians**
20 **in the park.** A simulation of a blast comparable to the Oklahoma City bombing
21 should be provided to indicate the collateral damage to the community.
22
- 23 5. **Civil Defense Shelter.** When the Federal Building was opened in 1962 it
24 included a civil defense shelter to accommodate 13,000 people. Nowhere in the
25 DEIS is there a mention of this feature, nor of plans to replace a disaster facility
26 and staging ground for federal and state troops. Thus removing the current
27 building's shelter represents an adverse impact on land use. Has the shelter
28 been converted to another use, perhaps storage?
29
- 30 6. **The Federal Building site was in the original 1888 deed for a Soldiers Home.**
31 Any use that does not directly service to veterans therefore violates the express
32 wishes of the grantor and represents an adverse land use impact. Please
33 provide documentation regarding the transfer of this site from the VA in
34 violation of the deed.
35
- 36 7. **Current Building outdated.** The GSA has admitted at public meetings and in
37 the DEIS that there are severe problems with the current Federal Building. Thus
38 presenting retaining the building or remodeling it are not good faith alternatives
39 and would not be cost-effective options, in violation of federal policies to save
40 taxpayer funds.
41
- 42 8. **Expansion Potential.** The DEIS fails to provide protections against further
43 expansion on this site, e.g., another building or conversion of the 190,000 SF
44 storage facility to offices. Please explain what safeguards can be offered to
45 prevent any further expansion on this site.
46

FEDERAL BUILDING COALITION

- 1 9. **Employee counts.** The number of employees projected for this site appear to
2 be based on current staffing calculations (DEIS, page 2-5). There is no
3 protection against packing this building with additional employees and
4 generating more traffic, for example, in the 190,000 SF “storage facility.” Any
5 increase in employees, as shown in all three Alternatives, represents an adverse
6 land use impact, since the adjacent Westwood Community Plan anticipated only
7 the current count.

8
9
10 **Federal Employees Increase with all Three Alternatives Plus Relocated Employees**

11

ALTERNATIVE	NUMBER OF EMPLOYEES ON SITE	PLUS NUMBER OF EMPLOYEES OFF-SITE IN STUDY AREA
Current Federal Building	1,252	815 Social Security, etc.
Alternative 1 (three buildings)	4,092	815 Social Security, etc.
Alternative 2 (two buildings)	1,782	815 Social Security, etc.
Alternative 3 (“No Action”)	2,067	815 Social Security, etc.

12
13
14
15
16
17
18

- 19 10. The **indirect impacts** of this project include transferring at least 815 federal
20 employees to nearby facilities within the study area (three mile radius from the
21 Federal Building in Westwood).
- 22
- 23 11. **SCAG Guidelines.** SCAG has been a major proponent of locating jobs in jobs-
24 poor, housing-rich communities. This proposal does not comply with this
25 regional mandate. It is therefore an adverse land use impact that also has
26 adverse traffic impacts. Alternative sites should be evaluated on comparative
27 socio-economic benefits that bring benefits, not penalties, to the community.
- 28
- 29 12. **10 Years of Construction.** The DEIS fails to explain why construction must be
30 protracted over a decade. Wherever sited, all the buildings should be built
31 simultaneously as a mitigation of construction impacts.

32
33 **II. VISUAL AND AESTHETICS**

- 34
- 35 1. Alternatives 1 and 2 have adverse impacts because they reduce open space in an
36 area extremely short of open space (see Lake and Freedman, *White Paper on*
37 *Federal Land Management Issues in West Los Angeles*, March 2006, submitted at
38 March 14, 2006 public hearing on DEIS).
- 39
- 40 2. There is no basis to conclude that Alternative 2 is beneficial because there is no
41 information regarding design, footprints, etc. A DEIS must provide information

FEDERAL BUILDING COALITION

1 on the design and location of a structure so that its aesthetic impacts can be
2 evaluated.

- 3
- 4 3. Impacts on view sheds are ignored and impossible to analyze without the
5 proposed footprints and heights of the buildings (page 4-7). This must be
6 provided in a revised DEIS and recirculated for public comment. A new hearing
7 must also be held for the revised DEIS, with the hearing to be scheduled at the
8 end of the comment period, rather than the beginning. In this way, members of
9 the public and elected officials will have more time to prepare comments for
10 the public hearing.
- 11
- 12 4. In the absence of the footprint and height, a shade shadow analysis cannot be
13 performed. It would appear that some shadow impact would occur in the park,
14 unless proven through the requested analysis (see page 4-8, Lines 8-9). It is
15 therefore speculative that there are no shadow impacts on the park.

16 III. SOCIO-ECONOMICS

17 1. EMPLOYMENT AND COMMERCIAL ACTIVITY

- 18
- 19 A. While this project might be a plus for an under-served, lower socio-
20 economic community that lacks employment opportunities, **no data are**
21 **presented to substantiate the claim that the project would help the**
22 **local economy.** NEPA requires that a socio-economic analysis be
23 provided. Instead, a few throw-away lines, entirely speculative,
24 conclude that the project will help the economy when in fact, the
25 reverse holds true. UCLA and local businesses frequently dismiss
26 employees early due to street closures associated with the Federal
27 Building. These impacts must be analyzed in a revised DEIS.
- 28
- 29 B. **Indeed, experience has shown that the chronic protests, bomb scares**
30 **and street closures harm the economy.** They make Westwood an
31 undesirable area because of the unpredictability of street closures. This
32 is an adverse employment and commercial impact.
- 33
- 34 C. **Annual Congestion Costs.** Furthermore, the traffic delays caused by
35 existing gridlock, exacerbated by protests and street closures, imposes a
36 high economic burden on the region. The annual congestion costs for
37 traversing from Veteran to Sepulveda along Wilshire Boulevard totaled
38 \$258 million in 2005 (Lake and Freedman, p. 20).

39 2. REAL ESTATE AND SOCIO-ECONOMICS

- 40
- 41
- 42 A. In the absence of an accurate traffic analysis that includes the entire
43 federal building-out from the Armory site and the VA, it is impossible to
44 reach the conclusion that any alternative presented does not create
45
46

FEDERAL BUILDING COALITION

1 severe negative impacts for real estate and socio-economics. If people
2 cannot reach the office buildings of Westwood, rents will fall and
3 property values will be reduced. Ultimately, the tax base of the City of
4 Los Angeles would be reduced by these gridlock impacts, as well as the
5 congestion costs discussed above, that reflect lost time from work. The
6 impacts on the 500,000 daytime population, including UCLA and its
7 trauma center, would be disastrous.

8
9 B. In Lake and Freedman (*ibid.*), analysis of the federal build-out concludes
10 that over 320,000 additional daily vehicle trips would be generated and
11 35,000 pm peak trips, for an already the most congested in California.
12 These calculations were reviewed by the Los Angeles City Department of
13 Transportation. There is no excess infrastructure capacity to absorb the
14 proposed project's impacts, and all mitigation measures for the
15 immediate areas' streets have already been implemented.

16
17 C. **There was no analysis of the socio-economic impacts of moving this**
18 **facility to an under served community.** This would have the
19 demographic benefits that the federal building site would not.

20
21 D. **There was no socio-economic impact analysis as required by CEQ**
22 **regulations.** All that was presented was a speculative statement that
23 the presence of the FBI headquarters would create additional jobs.
24 There is no evidence in the record to support such a statement. It is the
25 opinion of the community that the reverse is true, that the presence of a
26 major traffic generator will force businesses to decline and raise
27 congestion costs. Please provide a socio-economic analysis that consists
28 of a cost-benefit analysis that factors in the congestion costs, loss of
29 local business due to protests and traffic closures (bomb scares, etc.).
30

31 IV. TRAFFIC AND PARKING

- 32
- 33 1. Neither Alternative 2 nor 3 were analyzed. In the absence of such analysis, the
34 DEIS is inadequate and cannot be used to approve Alternative 2.
35
 - 36 2. There is no basis to conclude that with more federal employees in Alternatives 2
37 and 3, including relocated federal employees within the study area, that there
38 will be beneficial traffic impacts for Alternative 2 in the long term, or no
39 adverse impact under Alternative 3. Quite the contrary - it would have
40 substantial adverse impacts on thousands of commuters, emergency services,
41 and local residents.
42
 - 43 3. There are no data or analysis of the traffic impacts of Alternatives 2 and 3 and
44 therefore no basis to conclude that the project would be beneficial to traffic
45 conditions.
46

FEDERAL BUILDING COALITION

- 1 4. While every I-405 ramp between Venice Boulevard and Mulholland Drive were
2 analyzed, the most significant one, the Wilshire/I-405 ramps, just 125 feet from
3 the Federal Building, were never included in the DEIS. This is a shocking
4 omission that must be corrected. Furthermore, alternative sites were rejected
5 because they were too close to an elevated freeway (see DEIS p. B-4).
6
- 7 5. Also, there was no analysis of the proposed closure of the Montana/I-405 ramp
8 on traffic flow (see page 2-11), despite requests made during Scoping and the
9 traffic committee meetings.
10
- 11 6. A ten year construction period (construction periods are always overly
12 optimistic), is an excessive disruption of already dysfunctional traffic (see traffic
13 analysis, Lake and freedman, *Ibid*; *LA Times articles* on Robinson's May project
14 and Beverly Hills Hilton, attached).
15
- 16 7. The trip generation rate developed on the basis of a single survey with a 35%
17 response rate, is ridiculous. The DEIS fails to document how this rate was
18 developed. The rate of 2.2 trips per FBI employee defies logic. It implies that
19 only one in six FBI employees ever leaves the building to go to court,
20 surveillance, meetings, etc.
21
- 22 8. The study appears to assume that the FBI has no visitors at all. This does not
23 make sense since witnesses and others are interviewed on site.
24
- 25 9. There is no origin-destination study which was promised to Congressman
26 Waxman and the community, to determine where employees live and travel
27 from. This is critical information to aid in the selection of a site that would
28 minimize traffic for the region, rather than as proposed, worsen it.
29
- 30 10. There is no information on how many FBI employees work night shifts, day
31 shifts, etc.
32
- 33 11. There were 222 more visitors leaving the Federal Building site than entering,
34 according to the survey results in the DEIS (p. 60 of the Traffic Study by Katz,
35 Okitsu and Associates, states that 989 visitors entered the site and 1211 visitors
36 exited the site). This is surely evidence that the entire traffic study was flawed,
37 and that the trip generation rate derived from the survey is unreliable.
38
- 39 12. What are the traffic generation rates used for other FBI headquarters around the
40 nation? Why should this one be different?
41
- 42 13. The cumulative impact analysis for traffic due to other proposed/pending
43 projects failed to include the Army Reserve Armory land-swap proposal and the
44 VA's commercial development schemes (2001, 2005). These, in conjunction
45 with the FBI Headquarters, would have massive impacts on traffic conditions.
46
14. **Parking Supply.** The parking supply is proposed to be built during Phase 1. This

FEDERAL BUILDING COALITION

1 means that Phase 2 will not add new parking. The amount of parking proposed
2 is below the ratio of parking currently provided. Since there are no data
3 provided on visitors to the FBI, it would appear that the parking supply is
4 inadequate. Please explain how the parking supply was calculated, and how it
5 compares with parking for other FBI headquarters around the nation,
6 particularly for suburban areas with a commuting employee populations.
7

- 8 15. Currently there are 1,891 parking spaces (p.2-6). But only 2,155 (page 2-9)are
9 proposed for the expanded headquarters. Please explain the basis for the
10 severely reduced ratio of parking-to-office space. Since most FBI employees
11 arrive by car, provision of adequate parking is critical. A reduced parking supply
12 is highly questionable.
13
- 14 16. Southern California Council of Governments (SCAG) policies (page 2-11, Lines 41-
15 49) were not addressed adequately in the DEIS. In particular, SCAG encourages
16 locating employment opportunities in housing rich, jobs poor areas. The
17 preferred alternative, the Federal Building site, is a jobs-rich area with housing
18 prices beyond the reach of most federal employees. Thus the choice of this site
19 would violate this SCAG directive.
20
21

22 V. PHYSICAL-ENVIRONMENTAL

23 1. GEOLOGICAL AND LANDFORM

24 A. Methane gas hazards. The adjacent properties to the east and
25 northeast are mapped by the City of Los Angeles ZIMAS zoning
26 information system (online at www.lacity.org) as methane gas hazards.
27 Is the Federal Building site also a methane gas hazard area? What
28 mitigations will be provided to address this problem? The DEIS failed to
29 disclose this environmental hazard and to recommend mitigation.
30
31
32

33 2. HYDROLOGY AND WATER QUALITY

- 34 A. Westwood has a very high water table. An underground river flows
35 beneath Veteran Avenue. Any physical barriers that divert this flow must
36 be examined.
37
38 B. Will the excavation on site for the project cause subsidence for adjacent
39 structures east of the site?
40
41 C. Subterranean construction would require pumping potable water to the
42 storm drain, wasting precious water in a arid region. There are no
43 proposals for water reclamation on site to conform with the regional
44 watershed management guidelines. Please provide mitigation measures
45
46

FEDERAL BUILDING COALITION

1 to address depleting the aquifer. Note: a request was made during the
2 Scoping process to address this problem. It was ignored.

- 3
4 D. More paved area means less groundwater recharge. This was not
5 analyzed. More paved area means that the project would create more
6 runoff and have adverse impacts on the watershed and on Santa Monica
7 Bay. These impacts must be identified, measured and mitigated.
8

9 VI. VEGETATION AND WILDLIFE

- 10
11 1. It is not clear whether or not a wildlife inventory was conducted for the site.
12 Page 2-9 does not provide an inventory of species. Neither does page 3-35.
13
14 2. What are the impacts of the proposed project on the five “Special Species”
15 listed on page 3-35?
16
17 3. What would the impacts on these species be if a bomb blast occurred or a terror
18 attack?
19
20 4. What would be the impact on the five species if all proposed federal projects
21 occurred (VA, Armory, and Federal Building site)?
22
23 5. The open space on the current site helps improve air quality and combat global
24 warming. To reduce open space is therefore an adverse impact on air quality
25 and vegetation.
26
27 6. The impact of more traffic creating more emissions is not analyzed in the DEIS.
28 Impacts of severe traffic congestion due to this project and cumulative impacts
29 must be analyzed. How do these emissions impact the State Implementation
30 Plan under the Federal Clean Air Act?
31

32 VII. NOISE

- 33
34 1. There is no analysis of the increased noise due to additional traffic and protests.
35
36 2. **There is no analysis of helicopter noise and operation.** Note that heliports are
37 not permitted in commercially zoned areas and require special permits.
38 However, heliports are permitted by right in industrially zoned properties. Thus
39 the choice of a high-rise office corridor conflicts with the local zoning and
40 creates a hazard for adjacent office buildings being disturbed by frequent
41 helicopter traffic, and the risk of accidents with medical helicopters flying out
42 of UCLA Hospital.
43

44 VII. CULTURAL CONDITIONS

- 45
46 1. There is no analysis of the impacts of the proposed project on historical

FEDERAL BUILDING COALITION

1 Westwood Village, nor on sensitive receptors (nearby schools, UCLA and children
2 in Westwood Community Park. What risks do these populations run in the event
3 of a terror attack on the FBI headquarters?
4

- 5 2. Are there other FBI Headquarters that are built in residential neighborhoods and
6 adjacent to a public park?
7

8 IX. PUBLIC SERVICES 9

10 1. POLICE PROTECTION 11

12 A. **63 bomb scares since 2001 at Federal Building.** There is no analysis of
13 added demand for police services due to increased security and traffic
14 problems. The Lake & Freedman White Paper indicates that since 2001
15 there were 63 bomb scares at the Federal Building in Westwood. The
16 DEIS fails to analyze these bomb scares, despite a request in Scoping.
17 What are the costs to LAPD to respond to these episodes? What are the
18 costs to LA Dept. Of Transportation to send personnel out to the site to
19 close Wilshire Boulevard during a bomb scare? Page 4-30 must be
20 augmented with a thorough analysis of police resource impacts due to
21 bomb scares, protests, and terror alerts for the Federal Building site.
22

23 B. **Protests require police and traffic personnel resources.** In 2005 there
24 were 32 protest permits for this site. The protest permits are only the
25 tip of the iceberg since most protests do not require permits if they
26 merely stay on the sidewalk. These protests require an extraordinary
27 amount of law enforcement resources from the LAPD, LASD, CHP, etc.
28 There is no mitigation offered to offset the costs of these resources,
29 primarily to the City of Los Angeles WLA-PD.
30

31 C. What are the fiscal and traffic impacts of bomb scares and protests?
32 This is not analyzed. Would the federal government be willing to
33 reimburse the City and County for the additional resources required by
34 the Federal Building presence? Will it indemnify adjacent property
35 owners for damages should a terror attack on the FBI result in damage to
36 adjacent buildings and UCLA?
37

38 D. According to the letter from LAPD (2003) in the Appendices, the response
39 time for police in West Los Angeles was 13.3 minutes, compared with the
40 citywide response time of 10.3 minutes. This is a significant lower
41 response time that was not discussed in the DEIS. More importantly, the
42 effect of the proposed project on increased delays in police response
43 time were not identified, analyzed or mitigated. Please rectify this
44 omission.
45

46 2. FIRE PROTECTION

FEDERAL BUILDING COALITION

- 1 A. Page 4-31 of the DEIS contradicts the claim made in Table ES-2 that
2 there are no adverse impacts on Fire Protection resources. The area is
3 already below the established city standard, and the added project
4 traffic as well as cumulative impacts from proposed VA and armory
5 developments as well as other projects, would drastically impact
6 emergency services. Please analyze the impacts of project traffic, using
7 standard trip generation rates, street closures due to bomb scares and
8 protests, to determine the adverse impacts on fire protection services.
9 Please explain what mitigation, if any, can be provided to offset those
10 impacts.
- 11
- 12 B. Analysis of impacts on Fire Protection services should include a worst
13 case scenario of (1) a major natural disaster (earthquake); (2) during
14 protests or bomb scares when Wilshire Boulevard is closed. Is mitigation
15 possible?
- 16
- 17 C. Slower response time endangers public safety. Please analyze the
18 impacts of reduced response time on public safety.
- 19
- 20 D. Please simulate a terror attack on the FBI Headquarters and extrapolate
21 the collateral damages to the community.
- 22

23 3. PUBLIC UTILITIES

- 24
- 25 A. More employees directly and indirectly in the study area would increase
26 the demand for water, electricity (especially for air conditioning, etc.),
27 natural gas, sewers and solid waste. Cumulative demand with the other
28 proposed/pending projects would severe impact those utilities. Please
29 analyze these impacts.
- 30
- 31
- 32

33 X. CHAPTER 1. PURPOSE AND NEED

- 34
- 35 1. The purpose and need for the FBI to expand is accepted as valid.
- 36
- 37 2. The failure to find viable alternative sites, however, is a shocking waste of
38 public resources. Perhaps this is because the GSA failed to retain professional
39 site selection consultants. Mailing an ad to brokerage firms does not constitute
40 a thorough professional search for alternatives.
- 41
- 42 3. **The Federal Building Coalition requests that 5% of the \$14 million budget for**
43 **this phase of project development be allocated to the community to fully**
44 **evaluate alternative sites, retain experts, and provide public education**
45 **outreach.** There is precedent for this request. The GSA retained Consensus
46 Planning to conduct outreach. The site selection process for the Ward Valley

FEDERAL BUILDING COALITION

- 1 nuclear dump proposal was conducted via contract to the League of Women
2 Voters. There are no doubt other precedents wherein the community can
3 become a partner in solving the need to expand FBI facilities in a safe,
4 compatible manner.
- 5 4. Please explain the selection of a Kansas City, Mo. EIS preparer rather than a
6 local consultant. Note that several obvious errors are in the document because
7 the consultant is not familiar with the road system, etc. For example, the 110
8 was identified incorrectly as the southern boundary of the search area. For the
9 revised DEIS, please contract with a Southern California firm.
- 10
- 11 5. Despite the requests in Scoping to provide a site selection methodology and
12 criteria, this was not done. Reasons for the 35 sites were rejected or even
13 selected, are not consistent or logical. For example, two sites were eliminated
14 because they were too close to a freeway or local streets could not be widened
15 to accommodate additional traffic.
- 16
- 17 6. No explanation was provided for the criteria changes and boundary changes from
18 the Scoping document and NOI. How and why was a "prestigious" high rise
19 office corridor chosen? The boundaries were narrowed after Scoping so that
20 only the Federal Building could be chosen.
- 21
- 22 7. Why is an office area rather than an industrial area preferred? For example,
23 land is cheaper in industrial areas, so that a low-rise campus, far less visible,
24 with a generous buffer area, could be developed. Explain the functional basis
25 for requiring the prestigious office corridor site.
- 26
- 27 8. Contrary to the statement made on page 3-1, Lines 35-36, that the Federal
28 Building opened with the FBI as an initial tenant, the FAA was the original
29 anchor tenant as the Western Pacific Region for FAA that included Hawaii, and
30 the entire West Coast (e.g., Seattle). Please correct.
- 31
- 32 9. Furthermore, news articles regarding the approval and opening of the Federal
33 Building (1962-1969) do not indicate a major tenancy by the FBI. Indeed, an LA
34 Times article dated April 5, 1962, p. 11 states that the principal tenants would
35 be: "administrative quarters for the VA Regional Office, and for regional offices
36 of the Defense Department and the National Aeronautics and Space
37 Administration." When the building opened in 1969, the FBI was one of many
38 agencies that moved in, but hardly the "anchor tenant." Please correct and
39 provide proof that the FBI was the anchor tenant. What percentage of
40 employees and square footage was occupied at that time by the FBI?
- 41
- 42 10. Please provide a copy of the 1888 deed granting 300 acres for a soldiers home
43 that includes the Veterans Cemetery and the Federal Building site, Westwood
44 Park, etc. Please show a map that indicates this land.
- 45
- 46 11. Please provide all federal paperwork that would have permitted the GSA to take

FEDERAL BUILDING COALITION

1 possession of land deeded to Veterans, including the actual transfer document.
2 It is the position of the Federal Building Coalition that the VA lacked authority
3 and violated its fiduciary responsibility to Veterans to permit this site to be used
4 for any purpose other than direct service to Veterans. Please demonstrate the
5 legal authority to deviate from the original deed and to avoid the reversion to
6 the original heirs.
7

8 12. By locating the FBI headquarters in Westwood, personnel will still need to travel
9 extensively to (a) commute from their homes; (b) go to the Federal Courthouse
10 downtown; and (c) surveillance and interviews. Please analyze these trips and
11 their impacts on the traffic system.
12

13 13. Proximity to the Federal Courthouse would eliminate many trips and provide
14 convenient access to train service for many commuting employees from the
15 Valley and the north Valley.
16

17 14. Page 2-6: what is the floor area space of other FBI Regional Headquarters?
18

19 15. Analyze the compatibility of a secure FBI site with a public post office.
20

21 16. Provide visitor rates for other FBI headquarters.
22

23 XI. SITE

24
25 1. Page 2-7 Location Needs. GSA never requested that the City of Los Angeles
26 identify sites in the Northwest Valley per the scoping document (attached).
27

28 2. Please provide an explanation for failing to seek a site per the Scoping
29 document commitment to find a build-to-lease site in the northwest area of Los
30 Angeles.
31

32 3. Why did the GSA limit its search to City-owned property? Why not County, state
33 and federal property?

34 4. Why did the GSA eliminate sites because they were too close to a freeway and
35 local streets could not be widened to accommodate added traffic when the
36 same holds true for the Westwood Federal Building site? Page B-4: "Proximity
37 of the highway constitutes a detriment rather than an asset. Since the
38 freeway structure is elevated and overlooks the site, the property presents
39 FBI with an unacceptable condition for the safety and security of employees
40 and operations." The same holds true for the Federal Building site, but is
41 ignored. By this logic, the Federal Building must be eliminated as a safe site for
42 the FBI.
43

44 5. Please provide the justification for changing the boundaries and criteria for an
45 FBI headquarters from the original scoping document.
46

46 6. Why did the GSA rely on mailing ads to brokers and not instead retain

FEDERAL BUILDING COALITION

1 professional commercial brokers to find a site that matched the NOI and Scoping
2 requirements?
3

- 4 7. Please provide an example of any other federal project that required a location
5 in a prime commercial office corridor or prestige commensurate with the status
6 of the agency. These do not appear to have any functional basis and
7 considerably raise the cost of a site in such an area.
8
- 9 8. Since the GSA is exempt from local zoning, why does the site have to be zoned
10 for a high rise building?
11
- 12 9. Please explain why industrial sites were not considered as appropriate for this
13 facility.
14
- 15 10. High rise construction creates a higher profile and thus increases the site's
16 vulnerability. Thus high-rise may not be the safest way to develop an FBI
17 headquarters. Please provide data on low-rise versus high-rise site security.
18
- 19 11. Please evaluate the LA Air Force Base as an alternative site. It has plenty of
20 land and could provide an ample buffer, is close to freeways, and even permit
21 future expansion. It is also close to approximately 30+ percent of the FBI
22 workforce.
23
- 24 12. Please evaluate all federal, state and local sites within the service area, not just
25 within the overly-narrow boundaries developed after scoping.
26
- 27 13. Please evaluate privately owned sites that would meet the needs of the FBI.
28
- 29 14. Page 2-2/214, Lines 44-46, "other specific areas which may be recommended
30 by local officials." per Executive Order 12072, Section I-103, was violated
31 because local officials had made suggestions that were not investigated (see
32 letters from Councilmember Jack Weiss, and Betsy Weisman, LA City Planning
33 Department, for example). Both Weiss and Weisman (letter attached) made it
34 clear that Westwood was the wrong site for such a facility because of existing
35 traffic congestion.
36
- 37 15. The DEIS failed to comply with Executive Order 12072 Section 1-104(d):
38 "availability of adequate low and moderate income housing for Federal
39 employees and their families on a nondiscriminatory basis." The Federal
40 Building site is located in the most expensive housing market in Los Angeles.
41 There is a severe shortage of affordable housing in this region (see for example,
42 the Housing Element of the Los Angeles General Plan).
43
- 44 16. The DEIS failed to comply with Executive Order 12072 Section 1-105(a)
45 "availability of existing Federally controlled facilities." Nowhere in the DEIS is
46 such an analysis provided, despite Scoping comments to do this very thing.

FEDERAL BUILDING COALITION

- 1
2 17. "No potential sites were identified that were suitable for consideration (page 2-
3 2/2-14, Line 46) is not true. Several sites were identified by LA City and the
4 public but rejected per Perry Singerman, LA Mayor's Business and Economic
5 Development Team, according to a meeting held with the Federal Building
6 Coalition Co-Chairs, March 30, 2006. Because of the GSA's self-imposed
7 conditions, sites were rejected out of hand that would fulfill all criteria except
8 "prestigious office corridor."
9
- 10 18. Also, the city was only asked to identify city-owned sites, according to the July
11 5, 2005 letter from Mayor Hahn's office. Why not all sites, not just city-owned?
12
- 13 19. 3.1.1 fails to identify UCLA Hospital/Trauma Center and proximity to UCLA.
14
- 15 20. Page 3-5, Section 3.1.3, on the north is UCLA, which was omitted from this
16 section.
17

XII. LEAD AGENCY

- 18
19
- 20 1. Page 2-7 ignores the fact that the Federal Building site was deeded to the federal
21 government for the exclusive purpose of a home for disabled soldiers, and that
22 this purpose was in perpetuity. Since this restriction still applies, at the very
23 least, the VA must be a co-decision-maker.
24
- 25 2. Page 2-7. Exactly what other state and local permits will be required for this
26 site?
27

XIII. FUTURE PROJECTS

- 28
29
30
- 31 1. Please add the Army Reserve Armory development potential (see land-swap ad
32 attached) as well as the build-out for the VA CARES proposals to the future
33 projects list and to the cumulative impacts analysis.
34
- 35 2. Add the "Pumpkin Patch" project at Wilshire and Comstock.
36
- 37 3. Add the Beverly Hilton Hotel project as well as the Robinson's May project next
38 door (Whittier Drive and Wilshire Boulevard, Beverly Hills).
39
- 40 4. Add the proposals for condos and other office buildings in Century City.
41

XIV. ENVIRONMENTAL CONSEQUENCES

- 42
43
- 44 1. Page 4-1, Line 6 specifies indirect impacts, but these were not addressed in the
45 DEIS. For example, moving federal employees nearby, within the three mile
46 radius study area, must be included in the traffic analysis, and the claim that

FEDERAL BUILDING COALITION

1 Alternative 2 reduces the number of federal employees must be retracted, with
2 the new total of federal employees on-site and off, disclosed and analyzed.

3
4 2. Significance Criteria, Section 4.1.1.1, page 4-2, Lines 8-9 are both violated but
5 not disclosed in the DEIS: Line 8 "result in disruption, division, or isolation to
6 existing neighborhoods, communities or land uses." Protests and bomb scares
7 at the Federal Building do disrupt the community and impair emergency service
8 from police and fire. This must be acknowledged and mitigated, if possible.

9
10 3. Page 4-2, Line 9, "result in land use incompatibilities between project
11 development and adjacent community land uses." The existing Federal
12 Building is incompatible with the original grant deed for a soldiers home,
13 incompatible with a park, incompatible with a densely populated office and
14 residential area and a trauma center. These land uses are already suffering from
15 the federal presence on this site. An enlarged federal presence would create an
16 even greater incompatibility between adjacent land uses an the project.

17
18 4. The project would also be inconsistent with adjacent land uses because a
19 "hardened target" of blast-proof construction that is secured for FBI
20 employees is a magnet for attack that would put at risk adjacent uses (the
21 park, homes and businesses), page 4-3, Lines 11-12. The fact that there are
22 chronic bomb scares and terror alerts for this site is proof that the use poses a
23 security threat to its neighbors. The tenants may be safe, but not its neighbors.
24 This was pointed out during scoping, but ignored in the DEIS. Please address this
25 omission and provide security mitigations for adjacent land uses. If they cannot
26 be protected, please acknowledge this, and find a new site far from homes and
27 offices.

28
29 5. The project conflicts with the open space projections of the Westwood
30 Community Plan, which did not anticipate expanded structures on the Federal
31 Building site, and in fact, viewed the federal properties as vital open space for a
32 region with a shortage of open space.

33
34 6. The project conflict with SCAG transit and infrastructure policies by not locating
35 the facility near where FBI employees live.

36
37 Thank you in advance for your consideration. Given the amount of land and threatened impacts
38 to our infrastructure from federal properties in this area, we repeat our request to preserve
39 these federal lands for the direct benefit of Veterans and call for a moratorium on all non-
40 direct services to Veterans, preparation of a Federal Master Land Use Plan for these three sites,
41 and reject the Federal Building site for any expansion or use other than for the direct benefit
42 of Veterans.

43 Sincerely,

44 *Laura Lake*

45 Laura Lake, Ph.D.

FEDERAL BUILDING COALITION

1 Co-Chair
2 Federal Building Coalition

3

4

5 **Attachments:**

6

7 1. Over 500 letters of protest against the proposed project.

8

9 2. LA Times article on Beverly Hilton Hotel project.

10

11 3. LA Times article on Robinson's May project, Beverly Hills.

12

13 4. Blue GSA Scoping document that commits to a build-to-lease site in the northwest area
14 of Los Angeles (where most agents live).

15

16 5. GSA ad with changed boundaries and new criteria for prestigious location.

17

18 6. Press clips on Federal Building history.

19

20 7. Advertisement for Army Reserve Armory land swap.

21

22 8. LA Times article on Army Reserve Land Swap.

23

24 9. Press clips on terror threats and protests at Federal Building.

25

26 10. Betsy Weisman, LA City Planning Department letter regarding alternative sites.

27

28 11. 1888 Deed for western 300 acres of original 600 acres for Soldiers Home.