

Tract No. 7260 Association, Inc.

Serving the area between Santa Monica and Pico, and Beverly Glen and Century City

www.tract7260.org

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Please accept this letter as Tract No. 7260 Homeowner Association's comments in opposition to the proposed FBI headquarters expansion planned for the Federal Building site in West Los Angeles.

The Tract 7260 Homeowners Association runs from Pico to Santa Monica and from Beverly Glen to Century City. The group has been exceptionally involved development-related activities in West L.A. and is an active supporter of law enforcement. The group's president sits on the city council district 5 regional traffic taskforce and is on the park advisory board for the Westside Recreation Center.

Our association contains 1000 homes. Our web site, which contains numerous development-related articles for the West L.A. area is www.tract7260.org.

Overview

Prior to discussing the proposed project, Tract 7260 wishes to express its support and gratitude for the work done by the FBI. Tract 7260's opposition to the proposed project should in no way be seen as an opposition of the FBI or its mission. In fact, Tract 7260 believes that the needs of the FBI and therefore the public will be best served if the FBI headquarters is in a location that will provide maximal ability for mobilization and deployment of FBI resources in the event of an emergency.

The proposed development of the Federal Building property will result in the disruption of the lives of hundreds of thousands of citizens and impact regional commerce. The project, located in one of the most congested areas of the city, will impact both local and regional traffic. The I405, located just several hundred feet from the project, carries well over 322,000 vehicles per day just hundreds of feet from the proposed project site and represents a potential single-point failure for any urgently needed FBI deployment.

The proposed project further fails to recognize the impacts on Westwood Park and the security implications for residents and businesses in the area.

Our detailed comments are provided below.

Traffic

- The proposed project will introduce more traffic into an area that simply cannot handle more traffic. This is especially true for the I405 which carries well over 322,000 vehicles per day. The state of the 405 is best summarized in a quote from a June 30, 2005 letter from Senator Feinstein:
*“According to recent statistics, the I-405 suffers from the second worst congestion of any highway in the nation. And this particular section over the Sepulveda pass ...suffers from ever-worsening gridlock at almost all times of the day and night. This unbelievable congestion hinders the movement of goods, pollutes the air, and **takes an enormous toll on the lives of countless individuals and families in the Los Angeles area.**”* (emphasis added)
- Any project which impacts the 405 will have serious impacts on the Westside and on regional commerce. The June 2000 Federal Highway Administration EA stated:

1.2 Background

Interstate 405 is included in the National Highway System (NHS), and has been recognized as an essential link in a multi-modal transportation network. The I-405 is an interstate/interregional freeway, which originates at Interstate 5 (I-5) in Orange County, in the city of Irvine, and terminates at I-5 in Los Angeles County near the community of Mission hills. The route spans a total of 117 kilometers (72.7 miles) with 78 kilometers (48.5 miles) in District 7, Los Angeles County. The I-405 is one of the most heavily traveled freeways in the State as shown by the Annual Average Daily Traffic (AADT) volumes. Since it is the only north-south freeway west of downtown Los Angeles, most of the mobility of the Westside is dependent on this freeway.

- As shown on Table ES-2, DEIS admits significant impact on traffic AND ALSO states that despite the significant traffic impact that there will be beneficial impacts on long-term employment, commercial activity, real estate and socio-economics. This conclusion is contrary to common sense.

The definition of “significance” is that the project will “result in disruption, division, or isolation to existing neighborhoods, communities or land uses.” If traffic is significantly impacted, resulting in disruption, division, or isolation to existing neighborhoods, communities or land uses, commercial desirability and thus employment will suffer. The DEIS is therefore materially and fatally flawed with regard to its conclusions.

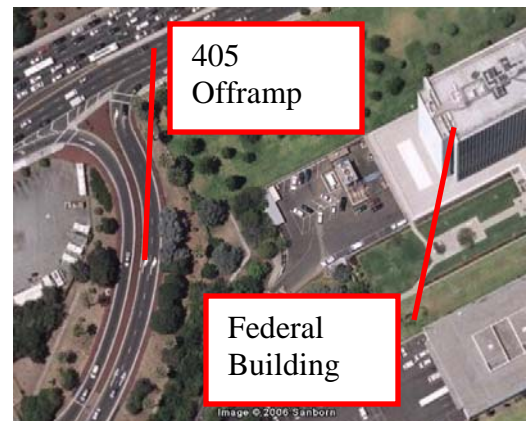
Further, as few, if any, FBI agents live in the impacted area and will commute via the 405 or other freeways, no employment benefit will result. Finally, as the proposed structure will not provide or consume services to/from other businesses, no economic benefit will result from the proposed project.

- The DEIS fails to discuss the impacts on the I405/Wilshire on/off ramps – the primary access points for the project to the regional transit system. The DEIS is therefore materially and fatally flawed with regard to its analysis.

Security

The DEIS does not discuss increased security concerns with regard to the enhanced FBI presence and to the vulnerability of the proposed site as it relates to the proximity to and reliance on the I405. Specifically:

- The DEIS does not speak to the placement of a hardened target in the middle of an area densely populated by exceptionally soft targets such as parks, homes and commercial office buildings.
- Given the already impacted transportation grid in West Los Angeles and the density of the West L.A. population, regional security which would depend on a rapid deployment of the FBI would be materially impacted.
- The FBI simply cannot be in a position to be dependent on the I405 for deployment in the event of an emergency. As stated above, most of the mobility on the Westside is dependent on the I405. Any disaster, natural or man-made, which impacts the area will also impact the I405, thus cutting off the FBI from access to the region at a critical time.
- The DEIS does not contain any discussion concerning the fact that the UCLA Medical Center is and will be the primary medical facility in the event of a major disaster. Additional development, especially at the I405/Wilshire choke point, will impact the ability of residents to reach the medical center.
- The DEIS does not evaluate the security concerns relating to the I405 being only several hundred feet from the project site. This is especially surprising given that the DEIS stated that a key requirement of the project is that it not be located close to rail tracks as they can be used as a means for terrorism against the site. Creating a



situation where thousands of large trucks pass just hundreds of feet from a key anti-terrorism facility just does not make sense.

- The DEIS does not discuss the safety/security impacts relating to Westwood Recreation Center which contains a heavily used playground and hosts AYSO and Little League.

Environmental

- The “No Action” alternative increases use of the property as opposed to showing a true “no action” alternative. On page 2-1 at line 35, the number of employees at the location is described as 1252. Table ES-1 shows the “no action” alternative as having 2067 employees. This prevents decision makers from analyzing the true impacts of the project.
- “Short term” construction impacts are cited throughout the DEIS. What must be understood is that West L.A. has experienced more than a decade of “short-term” construction impacts from numerous large projects. With this and current projects, “short-term” impacts will have lasted 15-20 years.
- The DEIS does not contain a discussion of shade/shadow impacts on Westwood Park.
- The DEIS does not contain any evaluation of the impacts on the activities at the Westwood Recreation Center which includes a heavily used playground (Aidan’s Place) and hosts both Little league and AYSO.



NEPA Discussion

The project is inconsistent with the goals set forth by NEPA. NEPA states:

(b) In order to carry out the policy set forth in this Act, it is the continuing responsibility of the Federal Government to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may --

1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
4. preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
5. achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

- Item b.1 is not fulfilled as the project seeks to eliminate more open space in the area.
- Item b.2 is not fulfilled as there will be:
 - Increased security concerns;
 - Increased traffic;
 - Decreased ability for emergency services to travel in the area;
 - Increased pollution; and
 - Decreased open space.
- Item b.3 is not fulfilled as there will be:
 - A degradation with regard to open space in the area;
 - A risk to the safety of residents resulting from the introduction of a larger target into the area;
 - Increased pollutants in the area;
 - A decrease in the ability of the FBI to mobilize in the event of a major disaster;
 - The possibility of unintended and undesirable impacts resulting from placing a large traffic generator in the path to key medical facilities;
 - The possibility of unintended impacts on proposed mass transit along the Wilshire corridor; and
 - The possibility of unintended impacts on key recreation facilities due to security concerns.

- Item b.5 is not fulfilled as West L.A. cannot handle increased traffic without substantial investment in mass transit. There is no balance between population and resources presented in the DEIS. West L.A. residents are already seeing a decrease in their standard of living as a result of increased traffic.

Conclusion

The DEIS is a fatally flawed document which does not provide the public or its representatives the ability to adequately determine the true impacts of the proposed project. It also fails to properly provide any alternative locations in the Southern California area.

The clear and obvious impacts of the project will be so detrimental to the area that an alternate location must be sought. Tract 7260 wishes to add its voice to the dozens of other groups and hundreds of thousands of other residents that both support the FBI and oppose the proposed project.

Sincerely,



Michael Eveloff
President

Tract No. 7260 Homeowners Association