



## BOARD OF SUPERVISORS COUNTY OF LOS ANGELES

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**ZEV YAROSLAVSKY**

SUPERVISOR, THIRD DISTRICT

March 14, 2006

Morris Angell  
Regional Environmental Quality Advisor  
Portfolio Management Division, Third Floor East  
Capital Investment Branch (9PTC)  
General Services Administration  
450 Golden Gate Avenue  
San Francisco, CA 94102

Dear Mr. Angell:

On June 14, 2004, I submitted comments for the scoping phase of the Environmental Impact Statement (EIS) regarding the proposed construction of a new Los Angeles Federal Bureau of Investigation Field Office Headquarters in West Los Angeles (FBI Headquarters). At that time, I expressed great concern over the massive amount of new Field Office construction proposed in the middle of one of the most highly congested and traffic gridlocked areas of Southern California. A review of the Draft Environmental Impact Study (DEIS) reveals an inadequate and unacceptable analysis of the traffic, safety, employee, future growth and alternative site issues. Consequently, I am strongly opposed to the proposed Westwood FBI Headquarters expansion at 11000 Wilshire Blvd.

Too few alternatives have been considered in the DEIS. The Los Angeles Field Office of the FBI has investigative jurisdiction over the Federal Central District of California which covers 18 million people residing in seven counties including: Los Angeles, Orange, Riverside, San Bernardino, San Luis Obispo, Santa Barbara and Ventura. It is inconceivable that no other site within the 40,000 square miles of the seven counties was included as a potentially viable alternative for a "permanent Field Office Headquarters which will accommodate the future projected growth of the FBI." Only one site was considered in the San Gabriel Valley, and no sites in the Inland Empire (San Bernardino or Riverside Counties) were considered.

The traffic analysis is flawed. Alternative 2 demolishes the current Federal Building and simply concludes that the impact is "beneficial" due to a decrease in traffic because of the reduction in non-FBI employees who will no longer work at the new, FBI-only facility. This scenario begs the question of what happens to the displaced 700 plus current non-

FBI employees? Are they displaced in the immediate area, the West Los Angeles region or scattered throughout the County? The question needs to be answered. The DEIS apparently assumes that they just disappear and go to another location outside of the current project vicinity. The impacts from displacing the non-FBI uses and 700 plus current employees must be addressed.

Traffic mitigation measures are inadequately addressed. Alternative 1 will make the current traffic gridlock worse (at least at 30 of the study intersections), yet no mitigation is proposed for those intersections because the DEIS indicates no feasible mitigation is possible. Alternative 2 proposes no traffic mitigation measures because of a purported "beneficial" impact.

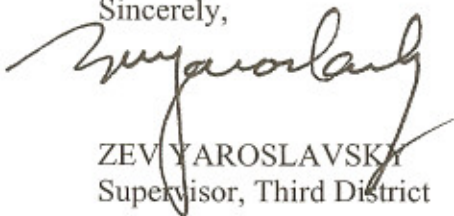
West Los Angeles area traffic is intolerable and will be further exacerbated by the proposed permanent location and future growth needs of the FBI Headquarters. Westwood is the wrong location for an expanded federal facility of this kind. It violates one of the four criteria for siting of the FBI facility which calls for maximizing emergency response times through rapid access of the freeways. While the Westwood location has access to the 405 Freeway, it is situated in the most heavily congested freeway system in the nation, and only assures access to a relatively immobile highway system.

By common sense standards, neither Alternative 1 nor Alternative 2 is compatible with the security guideline established as one of the four minimum location requirements. The guideline establishes that "railroad tracks can not border or cross the site, to prevent their use for terrorist incursions." As you may know, there is now serious discussion about extending the Red Line Subway along Wilshire Boulevard to the coast. The proposed new FBI Headquarters would be located immediately next to this proposed line.

Given the current and foreseeable severe traffic problems in West Los Angeles, I stand with the stakeholders in the surrounding communities and strongly oppose the proposed expansion at the Westwood Federal Building site.

Thank you for your considerations.

Sincerely,



ZEV YAROSLAVSKY  
Supervisor, Third District