

Westwood South of Santa Monica Blvd
Homeowner's Association
Incorporated November 8, 1971
P. O. Box 64213
Los Angeles, CA 90064-0213

April 16, 2006

Mr. Morris Angell
Regional Environmental Quality Advisor
Portfolio Management Division, 3rd Floor East
Capital Investment Branch (9PTC)
General Services Administration
450 Golden Gate Avenue
San Francisco, CA 94102

Subject: Los Angeles FBI Federal Building

Dear Mr. Angell:

On behalf of the 3500 homeowners who live in the area represented by Westwood South of Santa Monica Blvd. Homeowners Association, I write to express our disagreement and deep concern over the DEIS document prepared by the federal government in support of the location of a new FBI headquarters facility at the Wilshire Blvd. and Veteran Avenue location of the current Federal Building. Residents and businesspeople in our community both live and work within close proximity to the location in question and have reviewed the EIS document. A number of our members also attended the public meeting recently held about the project. While we are supportive of the mission of the FBI and are most appreciative of the work being done by the agency to protect our nation and its citizens, we are in strong disagreement with current efforts to locate a new Headquarters Building at 11000 Wilshire Blvd. As I testified during the public comment meeting, to do so is to make a poor investment of public dollars in a location that will be problematic for the agency and the community for the foreseeable future.

Our review and analysis of the EIS document has led us to conclude that the document that does not adequately address or analyze serious issues of importance. Until additional information is gathered and included, no decision in favor of a Wilshire Blvd. project can be made. In particular, data must be gathered on the following:

- alternative sites within a more broadly defined geographic area. There has been no convincing rationale presented that would lead us to agree with the boundaries for location that have been defined to date. The FBI HQ will serve a broad, multi-county region and one that will call on employees to converge from locations far and wide. To place the HQ building in a location that is known regionally (and nationally) for gridlock for much of the working day, does not appear to make any sense. To place the HQ building in a location that offers no reasonable north-south travel arteries beyond the 405/Sepulveda corridor does not appear to make any sense whatsoever. To place the HQ building in a location that does not offer staff the opportunity or option to use

public transportation does not appear to make any sense. In the analysis of the proposed and alternate sites, attention must be paid to the disposition of existing employees located in the existing Federal Building. Where will these staff people go? Will the officers remain in the general area? The DEIS does not address these people and the trips that are associated with them.

- The status of property deeded to the government for veterans affairs. The property currently being used by the government where the Federal Building, National Armory and VA Hospital and grounds are located was originally donated to the government for use to benefit our soldiers and veterans. While the Federal government has expressed interest in selling, leasing and/or trading some of this property for other purposes (including commercial, non-governmental uses), our community has been told that first a comprehensive plan for the use of the land is to be completed. No new uses, no changes in use and no other changes in the status of that property are possible without the development and adoption of a master plan for the Veterans Administration property. And, the land upon which the Federal Building sits is part of that property.
- A complete traffic analysis of the impact of the new project and its alternatives. There was not one speaker at the public comment meetings that did not mention the unacceptable levels of congestion in the area and the negative impact that additional development and staff assignments would have on the local and regional communities. Not only will added congestion cause costly time delays for local residents, business people and commuters, but it will also have a negative impact on those seeking to reach major destinations north and south of the Westwood area. As has already been mentioned, there are very few through north-south connecting routes in the metropolitan area. Testimony gathered at the recent public meetings provided ample insight into the many issues related to traffic and congestion on the Westside, and in particular at this project location. Both surface streets and the freeway are extremely congested (clearly reported in you own traffic report) and emergency access to UCLA hospital is compromised. There was no analysis of Wilshire Blvd. / I-405 ramps and no feasible mitigation for the many intersections that are congested, including Wilshire and Sepulveda Blvds. Employees working out of the Wilshire Blvd. location will have trouble getting to work and trouble responding to emergencies. We would all be better served by a more accessible location. There seems to have been no serious consideration given to locations that might be closer to employees' homes (or in places where staff might be able to afford a property of their own). Again, the scope of the search for a location was artificially limited to a narrow area that is not representative of the regional nature of this FBI operation.

The discussion of alternatives in the EIS is not complete or adequate. Alternative 1 is not realistic if the building's condition is as bad as is indicated. It should not be considered as a viable alternative. Alternative 2 artificially assumes that there is less traffic because the employees currently on the site just evaporate. Where will they go? You can't assume they will go out of the

area or the state. This needs to be reassessed with an inclusion of indirect and direct impacts. Traffic mitigation is still needed and still not feasible.

The Related Projects list does not have the Landmark Theatres project at the Westside Pavilion Mall but does include a Jack in the Box project. There are new projects in the Wilshire/Santa Monica Blvd. area that also will need to be analyzed as part of a comprehensive review. This type of sloppiness and lack of serious evaluation serves to underscore our concern that the EIS document was prepared not to analyze the proposed location, but to prove that it should be “the” one.

- Status of existing federal employees currently located in the Federal Building. There is no analysis in the EIS that shows where the non-FBI employees go in each scenario? Where will their offices be relocated? The EIS seems to assume that they will move to another state or somewhere that won't affect West LA traffic. It is possible that they will remain in the same area. If so, the traffic/trips that they generate must become part of this project's traffic analysis. The document is also unclear on the number of employees in leased space. A clear analysis of all the direct and indirect impacts based on a clear listing of the employees needs to be provided.
- The impact of this building and its operation on the community: The EIS does not analyze the safety/security concerns regarding the project's effect on neighboring buildings, the recreation center directly south, the UCLA campus, UCLA Hospital (which contains the community's emergency room facility), or other area residents and students. FBI requirements preclude having a headquarters location adjacent to railway tracks; we are concerned that the locating of an FBI HQ facility on Wilshire Blvd. will provide impediments for the future construction of the Wilshire Red Line Subway from downtown to Santa Monica. This public transit line, while still in its planning stages, is critical to supporting the projected growth on the Westside; its future cannot be compromised by the presence of an FBI facility.

*The case for the Wilshire Blvd. location: The document does not provide clear reasoning for selecting the Wilshire location. The Headquarter's coverage area is thousands of miles reaching from San Luis Obispo to Orange County and from the ocean to the Colorado River but the search area was artificially limited to the small area between the 405 and the 5, and between the 10 and the 110 (Magnolia). This is perhaps 50 sq. miles if Bel Air and the mountains are removed from consideration. We do not know why areas in the South Bay (where there are many former aerospace facilities), Ontario, the San Gabriel Valley, Valencia or the Inland Empire were not considered. There also is no explanation as to why there is a prohibition against being located adjacent to railroad tracks but not next to freeways. The dangers associated with vehicles on freeways are uncontrollable. The arguments about needing to incorporate storage space in the new FBI facility would argue against the selection of 11000 Wilshire as this land is too expensive and valuable to be used for storage. Similarly, the arguments for needing access would argue for a location in a less congested area.

*Ambient growth and cumulative impacts are not addressed properly in the EIS. There are no infrastructure improvements to keep up with growth and none on the immediate horizon. There are no meaningful plans to implement a north-south public transportation route in the Sepulveda Pass to address the gridlock there. The earlier mentioned plans to bring the Red Line from Wilshire and Western west to Santa Monica is many years off. The Green Line that terminates in El Segundo does not even reach LAX; the need to connect the line to the airport and to points further north is most obvious and yet not in any stage of development. Without the assurance of implementation of public transportation that would both alleviate current congestion and address the added traffic associated with this project and other developments in the area, it is impossible to support added density and car trips. One would think that a location whose employees can access and take advantage of the Metrolink rail lines would have an obvious advantage and should merit additional consideration by those involved in located the FBI HQ building. Please note that anyone involved in making the decision as to where this facility is to be located, must travel in the target area during peak hours before qualifying to participate in the decision-making process!

Mitigations cannot be evaluated: How can mitigation be evaluated if it hasn't been designed (page 4-16)? Again, the EIS should be revisited and ample documentation provided for analysis. How can intersections with LOS E or F in baseline experience no significant traffic effects? ANY more cars should be significant. The intersection study is misleading as intersections identified as having better levels of flow in some cases are not true intersections at all. Instead they are "T" intersections where streets terminate; drivers do not use them because they do not carry through traffic. The entire area suffers from a lack of through north-south arteries leaving a tremendous burden on the 405 freeway, Sepulveda Blvd. and the few winding canyon routes that are residential streets gridlocked through rush hour traffic.

We request that this EIS be revised and more importantly, that a real list of alternative sites be developed and evaluated. Before this building or any other structure is planned, we must request that the Federal Government make good on its promise to develop a Master Plan for the property that maintains its uses for Veterans. This site, the VA, and the Armory are not being looked at in the context of the community. The federal government has a responsibility to listen to the community and address their concerns rather than trying to rush to build a building that shouldn't be built.

Sincerely,

Barbara Broide, President

cc: Hon. Henry A. Waxman, U.S. Representative
Hon. Dianne Feinstein, U.S. Senator
Hon. Barbara Boxer, U.S. Senator
Hon. Zev Yaroslavsky, Los Angeles County Supervisor
Hon. Antonio Villaraigosa, Los Angeles Mayor
Hon. Jack Weiss, Los Angeles City Council Member