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March 10, 2008

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EA 120300
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Ms. Pearl Young
U.S. Environmental Protection Agency
Office of Federal Activities, EIS Filing Section
Mail Code 2252-A, Room 7241
Ariel Rios Building (South Oval Lobby)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Subject: I-405 Sepulveda Pass HOV Widening Project (10 to 101) Final EIS Federal Register
Publication (Errata)

Dear Ms. Young:

On February 27, 2008 the Federal Highway Administration (FHWA) and the California Department of Transportation (Caltrans) transmitted the Final Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) and a Section 4(f) Evaluation for the Interstate 405 Sepulveda Pass Widening Project to your office. Please be advised that the FEIS and the Section 4(f) Evaluation approval date has been changed to February 29, 2008.

We believe that you have processed our previous request that a Notice of Availability be published in the Federal Register in accordance with 40 CFR 1506.10. Enclosed are (a) five (5) copies of the revised signature page of the FEIS/EIR and (b) response to the U.S. General Services Administration Pacific Rim Region letter dated December 14, 2007 (well after the October 1, 2007 end of comment period), for your review and distribution. This document has been transmitted to all appropriate Federal, State, regional, and local agencies, as well as to other interested parties.

Any comments on this environmental document should be addressed to:

Carlos J. Montez
Senior Environmental Planner
Caltrans, District 7
100 South Main Street, MS-16A
Los Angeles, CA 90012

If you have any questions please call me at (213) 897-0703 or Cesar Perez (FHWA) at (916) 498-5065.

Sincerely,

A handwritten signature in black ink that reads "Ronald Kosinski". The signature is written in a cursive style with a large, sweeping initial "R".

Ronald J. Kosinski
Deputy District Director
Caltrans, District 7 for FHWA

Enclosures

Cc: Gene Fong
FHWA Division Administrator

SCH Number: 2002011017
FHWA-CA-FEIS 06-12-F
07-LA-405
PM 28.8/39.0
EA: 120300

WIDEN INTERSTATE 405 (SAN DIEGO FREEWAY) FROM INTERSTATE 10 TO US-101
IN LOS ANGELES COUNTY, CALIFORNIA

**FINAL ENVIRONMENTAL IMPACT REPORT/
ENVIRONMENTAL IMPACT STATEMENT
AND SECTION 4(f) EVALUATION**

Submitted Pursuant to (State) Division 13, Public Resources Code
(Federal) 42 United States Code 4332(2)(c), 23 U.S.C. 327 and 49 U.S.C. 303 by the
THE STATE OF CALIFORNIA, Department of Transportation, and
Cooperating and Responsible Agencies

Jan. 31, 2008

Date of Approval



Ron Kosinski
Deputy District Director
District 7 Division of Environmental Planning
California Department of Transportation

FEB 29 2008

Date of Approval



Douglas R. Failing
District Director
District 7
California Department of Transportation

The following person may be contacted for additional information concerning this document:

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Abstract

This Final EIR/EIS addresses alternatives for widening and improving Interstate 405 (I-405) from Interstate 10 (I-10) to U.S. Highway 101 (US-101) in Los Angeles County. The California Department of Transportation (Caltrans) is proposing to add a High Occupancy Vehicle (HOV) lane on northbound I-405 from approximately National Blvd. (I-10) to Ventura Blvd. (US-101) in the City of Los Angeles, Los Angeles County. Alternative 2 has been identified as the Preferred Alternative after careful consideration of all agency and public comments on the Draft EIR/EIS. The recommended alternative would involve landform alterations and aesthetic impacts, impacts to homes, displacement of existing urban land uses and community disruption, traffic, air quality and noise effects, water quality, biological resources, impacts on utilities and short-term construction impacts. Mitigation measures would reduce the level of significance of these impacts.



GSA Pacific Rim Region

December 14, 2007

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
Department of Transportation (Caltrans) District 7
100 S. Main Street MS-16A
Los Angeles, CA 90012

Subject: GSA's Comments on the Interstate 405 Sepulveda Pass Project Draft
Environmental Impact Report / Environmental Impact Statement (DEIR / DEIS)
and Section 4(f) Evaluation, in Los Angeles County, California ("Project").

Dear Mr. Kosinski,

This letter expresses GSA's position that as currently depicted by Caltrans in its Preliminary Engineering Plans, the I-405 Sepulveda Pass Project ("Project") is generally unacceptable for the reasons stated below.

The United States of America, acting by and through the General Services Administration (GSA), is the owner and property manager of the Federal Building at 11000 Wilshire Boulevard, Los Angeles, CA. On February 27, 2007, GSA received an e-mail message from an Environmental Planner at Caltrans, indicating that the Sepulveda Pass Project was being restarted after being delayed for several years due to a lack of funding. Over the last several months, representatives from GSA and Caltrans have engaged in consultation with all of the tenant agencies in the Federal Building, including, among others, the Federal Bureau of Investigation (FBI), United States Postal Service (USPS) and Federal Protective Service (FPS). As a result of this process, GSA and the other Federal tenants in the building have identified preliminarily a number of concerns and issues regarding the project as it is proposed in the DEIR/DEIS. The following comment letter summarizes each of these issues, and follows up with concerns addressed in a letter, dated October 25, 2007, sent from Mr. Peter G. Stamison, Regional Administrator for GSA Pacific Rim Region 9, to Mr. Will Kempton, Director, California Department of Transportation.

Elimination of Vehicular Access and Maneuvering Ability for Delivery vehicles

The "fly-over" off-ramp, as it is proposed, blocks access of all delivery vehicles to the loading docks at both the Federal Building and the USPS regional distribution facility, rendering both facilities unusable. Due to the varied topography of the site and the orientation of the facilities currently located in the northwestern portion of the property, it is difficult to envision where there could be alternative adequate access to both loading docks. Caltrans engineers have not been able to demonstrate how this access problem will be mitigated or even if it can be. These loading docks are essential to the operation of the Federal Building and the USPS facility.

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NOTE: This GSA comment letter was received well after the October 1, 2007 "end of comment period." However, since GSA is a major stakeholder, they were given verbal assurance that their late comments would be considered. Their comment letter and Caltrans' responses were erroneously omitted from the Final EIR/EIS distribution.

Comments from the General Services Administration Pacific Rim Region on December 14, 2007:

- 1) Caltrans and FHWA engineers will ensure that vehicular access and maneuverability will not be affected by the further improved "fly-over" off-ramp. Caltrans will continue to consult with GSA and provide detailed constructability plans during final design.

The triangular-shaped temporary construction easement area, as proposed by Caltrans, encroaches on a large portion of the existing driveway approach used by delivery trucks entering the Wilshire site from Sepulveda Boulevard destined for the loading docks at the Federal Building and USPS facility. Furthermore, the proposed location of the temporary construction easement would adversely impact the logical flow of delivery traffic as well as eliminate the ability of large delivery vehicles (18-wheelers) to maneuver in such a way as to access the loading docks at both the Federal Building and USPS facility. The ability of these delivery trucks to efficiently access the site and loading docks is a primary concern of the Federal tenants, and has not been addressed by Caltrans. Until these permanent and temporary loading dock and access issues are addressed, a temporary easement cannot be granted.

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Increased Security Risks to Federal building and Occupants

Caltrans proposes an elevated "fly-over" off-ramp from the north-bound I-405 Freeway at Wilshire Boulevard that would cut across the northwest corner of the Federal Building property. The proposed "fly-over" constitutes a potential security threat to the Federal Building and its occupants. The proposed ramp elevates drivers and vehicles to a height of about 25 feet above ground level and brings them much closer to the Federal Building and the FBI's Auto Radio Maintenance Facility with an enhanced line-of-sight than does the existing on/off ramp. Additionally, various underground and above-ground fuel and water storage tanks are located in close proximity to the proposed ramp which is of concern to all of the Federal agencies at the Wilshire site, particularly the FBI, USPS and FPS. USPS also has a concern with the proximity of the "fly-over" to the fleet of USPS delivery vehicles stored in the nearby parking lot. Among the essential mitigation measures, reinforced concrete enclosures or encasements will need to be installed at a minimum in order to fortify these tanks and vehicles.

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The FBI believes that a mitigation measure would be needed to block the view of potential terrorists, such as a security wall approximately 10 feet in height constructed along the eastern edge of the "fly-over." The design specifications for the security wall are currently being considered by the Federal Government and will be provided to Caltrans during future pre-design consultation meetings. Notwithstanding the concept of a security wall as a mitigation measure, the Federal tenants take the position that the wall would be exceptionally unsightly and aesthetically displeasing to the Federal employees and the public at large. All things considered, the "fly-over" and security wall are not desirable and other options must be considered.

Loss of Parking

Caltrans' proposed project will adversely impact parking related to the function of the USPS facility. Currently, there are a total of 205 parking stalls available in the USPS parking lot, which are used for delivery trucks and employee parking, as well as maneuvering space for delivery trucks. It is not possible for GSA to determine from the Preliminary Engineering Drawings provided by Caltrans how many parking spaces or how much maneuvering space will be lost due to the placement of support columns for the proposed "fly-over." It is reasonable to expect, however, that much of the USPS parking lot will be adversely impacted during the construction period and permanently thereafter. Any loss of parking would seriously impact the operation of the USPS facility, due to the lack of alternative land for parking in other areas of the Wilshire site, and the need to locate employee and delivery truck parking in close proximity to the USPS facility. One possible mitigation measure suggested by Caltrans would be to replace the lost parking stalls with a new permanent 2-story parking structure to be constructed in the vicinity of the current USPS parking lot. For this option to be acceptable to GSA and the USPS, any such parking structure would need to be able to accommodate both employee passenger cars and

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- 2) A 10-foot high security wall will be built along the off ramp. This wall will be aesthetically treated on both sides.
- 3) A total of 9-10 parking stalls will be affected. However, 20 parking stalls would be provided on Caltrans land that can be transferred to GSA for compensation.

smaller delivery trucks. Design specifications for the parking structure have not yet been drafted, and specific design criteria will need to be worked out to the mutual satisfaction of the Federal tenants and Caltrans during future pre-design consultation meetings.

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Traffic & Safety

Depending on the season, thousands of men, women and children daily visit the Los Angeles Passport Agency, US Post Office and other agencies at the Federal Building. The Federal tenants have expressed serious concerns regarding the safety of pedestrians on the sidewalk along Sepulveda Boulevard, as well as vehicles entering and exiting the Wilshire site via Sepulveda Boulevard. Historically, it is a common occurrence for several north-bound City buses to be parked along the eastern curb of Sepulveda Boulevard, thereby blocking the visibility of drivers entering and exiting the Wilshire site onto Sepulveda Boulevard. This is already a dangerous condition which may be further exacerbated during the construction period. To alleviate this situation, GSA encourages Caltrans to consult with the City of Los Angeles regarding the feasibility of imposing the following two traffic control measures: 1) Installing a 3-way traffic light on Sepulveda Boulevard at the entrance/exit of the Wilshire site, and 2) restricting parking along Sepulveda Boulevard by painting the curb red for a distance of approximately 150 linear feet on both sides of the entrance/exit.

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Temporary Construction Concerns

Construction activities associated with the on/off-ramp realignment and "fly-over," as proposed, creates a concern related to disruption of and damage to underground wiring and conduit currently in place which serve the bollards, security gate, security systems, security cameras, lighting, etc. Any disruption to these utilities will severely impact our security systems. The FBI and FPS will require that new systems be installed to replace the current systems. Since the security systems must remain functional at all times, the replacement systems will need to be installed prior to the beginning of any construction of the proposed on/off ramp realignment. Additional security systems and lighting in and around the project area will also be necessary due to the additional risk posed by construction traffic related to the project.

As a short-term security issue, the FBI and FPS are particularly concerned with who will have access to the site during construction. This is due to the change in the type of vehicles from what are now primarily passenger vehicles to large construction vehicles. For this reason, systems will need to be installed to ensure that all workers and vehicles are documented, identified and monitored around the clock, especially after dark. These security measures will necessarily include such things as video cameras, lighting systems, personnel identification badges and vehicle identification systems.

We are also concerned that Caltrans' temporary construction activities will interfere with our construction activities in the building, whereby multiple large vehicles will need access to the same area of the site.

It is anticipated there will be an adverse impact to air quality. It is expected, as well, that increased noise and vibration associated with construction activities may be disruptive to Federal employees during working hours. GSA and the other Federal tenants are concerned with the potential threat posed to underground existing irrigation systems and underground storage tanks, which are relatively old and susceptible to damage from vibration.

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- 4) The traffic safety measures that GSA has proposed will be seriously considered. A traffic signal and curb painting may be included in the TMP, if warranted. The County of Los Angeles and the City of Los Angeles Department of Transportation will be involved in the consultation process for this and other TMP measures prior to construction.
- 5) Caltrans will work with GSA/FBI/USPS/Utility companies to address and solve these temporary construction concerns during final design and prior to construction. Concerns raised regarding air quality, noise, vibration, landscaping/vegetation, utilities, and traffic are addressed in the topical sections of this Final EIR/EIS.

As proposed, the project will destroy a considerable amount of existing landscaping and site improvements, including mature trees, lawn, curbing, asphalt/concrete paving, irrigation systems, planter boxes and security bollards, etc. There may also be a need to relocate utility lines (gas, power, sewer, water, etc.) prior to or during the course of construction and beyond.

Currently, the public and Federal employees are able to access the Federal Building site both from Veteran Avenue and Sepulveda Boulevard. Since most of the construction activities associated with the proposed project will be located on the west end of the site adjacent to Sepulveda Boulevard, however, it is anticipated that this circulation pattern will shift mainly to Veteran Avenue. As the public patrons and employees attempt to avoid the disruption along Sepulveda Boulevard, the increased traffic will cause congestion and delays along Veteran Avenue and interrupt the flow of traffic to and from the Federal Building.

Lack of Alternative Realignment Options Considered by Caltrans

To date, Caltrans has provided to GSA only one design option for realignment of the proposed on/off ramp affecting the Wilshire site. However, Caltrans has not disclosed to GSA details or drawings of any other possible design alternatives that Caltrans may have considered. We believe that there are other suitable alternatives that can meet Caltrans' stated purpose and need without the significant adverse impact to the Federal Building created by Caltrans' single proposed re-alignment option. GSA informally presented Caltrans with one other realignment option for consideration which would eliminate the need for the "fly-over." Caltrans responded without specificity with only an informal email message with draft drawings stating that GSA's proposal does not meet Caltrans' or Federal Highway Administration design guidelines for curve radius and slope. GSA is not satisfied that Caltrans has adequately evaluated this option and all other possible design options, and takes the position that additional design work must yet be completed in concert with GSA and other interested parties. In order to satisfy the National Environmental Policy Act (NEPA), a reasonable range of alternatives must be considered. We do not believe that Caltrans has met this standard by its consideration of one re-alignment option.

Further Planning and Design

GSA's ability to provide Caltrans with the real property necessary for a realignment of the I-405 freeway on/off-ramps depends on whether there are acceptable solutions for the adversely impacted critical functions. Over the last several months, representatives from GSA and the other tenants in the Federal Building (FBI, FPS, USPS, et al) have met on several occasions in an attempt to coordinate planning efforts. Caltrans has informed GSA that they plan to award a design-build contract for the project sometime in the fall of 2008. Clearly, waiting until the project has proceeded so far to determine if there are workable solutions, and then to start negotiations for transfer of the requested real property, is not practical.

Caltrans officials have indicated that they are willing to initiate planning efforts using internal resources to develop design schemes for the Wilshire site. To date this has not happened. The Federal agencies involved are not satisfied that feasible solutions have been worked out for access to both loading docks, for ways to minimize the risk of terrorist attacks, and for mitigation measures for other adversely impacted functions as discussed herein. As things stand now, GSA cannot enter into negotiations to accommodate Caltrans' request for conveyance of the real property they have identified.

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6) Caltrans studied many proposals for the Wilshire Boulevard interchange to develop a safe and efficient interchange design. In addition to the plan presented in the EIR/EIS, the following four designs were analyzed:

- (a) **Interchange Similar to Existing:** The accident rates are high and congestion is heavy at the existing interchange. A design maintaining the existing interchange configuration would create worse conditions than the current due to freeway widening (adding a northbound HOV lane and standardizing the northbound lanes, median, and shoulder). After the project is constructed, the safety and efficiency of the interchange would be worse than the current situation. It was determined that this alternative design variation was not viable.
- (b) **Partial Cloverleaf Interchange:** This design would create a loss of two access points that would constitute a quarter of the connecting points. This loss would compromise the efficiency of this heavily traveled interchange. This design would require installation of two additional traffic signals at the ramp terminals along Wilshire Boulevard. Wilshire Boulevard will experience more congestion and accidents due to the proximity of the two signals, which would negatively affect freeway operations. All of these features would compromise the safety and efficiency of the interchange. It was determined that this design variation was not viable.
- (c) **Diamond Interchange:** This design would create a loss of four of the eight access points of the existing full cloverleaf interchange. It does warrant the traffic demand at this location. This design would require installation of two additional traffic signals at the ramp terminals along Wilshire Boulevard. Wilshire Boulevard will experience more congestion and accidents due to the proximity of the two signals, which would negatively affect freeway operations. The accident rates and congestion would be worse than the partial diamond interchange. All of these would result in a less safe and efficient interchange. It was determined that this design variation was not viable.

Studies, Fees and Costs to be incurred by Caltrans

Should agreement be reached, GSA would expect Caltrans to incur all fees and costs associated with mitigation studies and measures necessary to ensure the continued operation of all existing and proposed onsite facilities in a secure and efficient manner both during and after construction. This may include the cost for construction of an unidentified solution to the loading docks problem, and for construction of a 2-story parking structure for the USPS. Furthermore, Caltrans would be expected to incur the up-front funding for design fees, costs of studies and all other costs for repair and or replacement of all site improvements disturbed or destroyed during construction, including landscaping, conduit, wiring, curbing, paving, etc., as identified above.

Compensation

To date, Caltrans has not submitted an informal or formal offer to GSA outlining its proposal for compensation for the proposed partial taking of the Federal property (including fee land area, aerial easement area, temporary construction easement area, and severance damages). Since Federal property cannot be the subject of a taking by a State agency, GSA expects that, should agreement be reached, an adequate compensation package would be negotiated between the parties before a final decision is made as to the Project.

Conclusion

GSA, along with the other Federal tenants, find the concept of the "fly-over," as it is proposed by Caltrans, to be very problematic and generally unacceptable, due to the concerns described above. As previously stated, GSA takes the position that more study and analysis of alternatives for the realignment of the on/off ramps affecting the Wilshire site could bring positive results, and we encourage Caltrans' engineering and design staff to work on developing other alternatives.

On behalf of all Federal tenants at the Wilshire site, we thank you for your attention to and consideration of our comments. We look forward to the release of the Final EIR.

If you have any questions, please feel free to call me at (415) 522-3473.

Sincerely,

 Morris Angell, MAI, CCIM, MCR, Grad Cert NEPA
 Senior Asset Manager &
 Regional Environmental Quality Advisor
 Portfolio Management Division
 Capital Investment Branch (9PTC)

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- (d) **Shortened Cloverleaf Interchange:** This design was similar to the recommended plan. GSA suggested that the northbound on-ramp be shortened and moved westerly to a point closer to the Sepulveda Blvd. intersection to reduce impacts on the federal property. This plan created two small radius curves that did not meet FHWA/Caltrans design standards. This plan also shortened the weaving distance from the street right turning point to the beginning of the on-ramp making it more difficult for vehicles turning right from Sepulveda Blvd. to Wilshire Blvd. The grade was also too steep for vehicles and could not be approved.
- 7) Caltrans has worked hard to reduce the impacts identified and we believe the recommended alternative is feasible. Caltrans eliminated the impacts to the USPS truck route and FBI loading ramp. Caltrans will pursue installing a signal and painting 150 feet of the curb on both sides of the entrance/exit. Caltrans and FHWA will continue to work with GSA et al during final design.
- 8) Due to the State's proposed project, several private utility lines need to be relocated. The relocation of these private service lines will require work outside the State's proposed right of way. The facilities are services installed and maintained on private property, and require relocation by the property owner/lessee. Costs related to the effort to relocate the facilities which conflict with the proposed construction, will be reimbursed by the State. Documentation substantiating actual cost of the completed work (contractor billing receipts with evidence of payments having been made) will then serve as a basis for reimbursement.
- 9) The Right-of-Way (RW) contract will be the document forming the agreement to reimburse costs incurred by the property owner related to relocation of private utility service lines. The RW contract will be presented with the First Written Offer, after the RW appraisal has been completed. The RW appraisal cannot be initiated until after the Environmental Document is approved, and more detailed RW maps are finalized. Therefore, with the proposed project schedule of milestones, the First Written Offer is targeted for September of 2008.

10) Caltrans has taken the following action:

- The final Caltrans Wilshire Boulevard interchange design eliminated impacts to the USPS truck route and the ramp to the underground loading dock.
- Caltrans minimized the impact to parking stalls in the GSA parking lot. Caltrans can compensate 10 affected parking stalls with 20 new ones.
- Caltrans will provide a 10-foot high security wall along the off-ramp in the parking lot. Caltrans will provide aesthetic treatment on both sides of the wall.
- Caltrans analyzed several alternatives for the design of the Wilshire Blvd. interchange. The advanced cloverleaf interchange is the only alternative that would improve safety and efficiency at this location.
- Caltrans is committed to ongoing coordination with GSA to resolve any outstanding concerns.