UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 19, 2010

Mr. Robert Kellar, Vice President
Federal Reserve Bank of San Francisco
101 Market Street, Mail Stop 270
San Francisco, CA 94105

Re: U.S. Environmental Protection Agency (EPA) comments for the Federal Reserve Bank of San Francisco's (Bank) Final Environmental Impact Statement (FEIS) on the proposed sale of the building located at 1015 Second Avenue in Seattle, Washington (Building). EPA Project Number: 09-041-FRB

Dear Mr. Kellar:

EPA has reviewed your FEIS and we are submitting comments in accordance with our responsibilities under NEPA and Section 309 of the Clean Air Act (CAA).

The FEIS is generally responsive to our comments. We appreciate the additional information on differences between federal and city "green" requirements. We also appreciate the additional information on the applicability of these requirements to the proposed alternatives. Your conclusion that, "...the environmental consequences would be similar under Alternatives A and B, whether the property is owned by a federal agency or private entity..." is an example of your responsiveness to our interest in whether or not redevelopment or renovation under federal agency or private ownership would result in significantly different environmental impacts.

Also, as we discussed in our recent phone conversation, in the interest of decreasing the environmental impact of the Bank's facilities and operations in general, we encourage the Bank to incorporate lessons learned through this project into a comprehensive environmental strategy. Such a strategy is often referred to as an Environmental Management System (EMS), and a robust EMS can go a long way towards identifying and managing the environmental impacts of facilities.

Developing an EMS that tracks federal "green" requirements is a potential path for the Bank to establish itself as a leader in environmentally protective facilities management. Tracking federal energy goals for buildings, for example, would provide the Bank with clear targets which generally go above and beyond local environmental regulations. Consider the amended National Energy Conservation Policy Act, which requires new federal buildings or federal buildings undergoing major renovations to be designed to reduce fossil fuel-generated energy consumption by 65 percent as of 2015, 80 percent as of 2020, 90 percent as of 2025, and 100 percent as of 2030 (42 U.S.C. Part 6834(a)(3)(D) (2009). These targets are an example of specific federal "green" goals - more of which are usefully listed on pages 72-76 of your FEIS

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along with various federal "green" requirements,. Goals - such as the one described here - and requirements can inform environmentally protective facilities management. For more information, resources and guidance on developing and implementing an EMS see http://www.epa.gov/ems/index.html and http://www.fedcenter.gov/programs/EMS/. Please also consider the Federal Green Challenge at http://www.epa.gov/federalgreenchallenge/.

Thank you for this opportunity to comment and to provide you with this information. If you have any questions or concerns please contact Erik Peterson at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

Christine Reichgott, Manager
Environmental Review and Sediment Management Unit

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