



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

August 10, 2011

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

Re: U.S. Environmental Protection Agency (EPA) comments for the Federal Reserve Bank of San Francisco's (Bank) Draft Environmental Impact Statement (DEIS) for the building located at 1015 Second Avenue in Seattle, Washington (Building). EPA Project Number: 11-4112-FRB

Dear Mr. Kellar:

We are submitting comments in accordance with our responsibilities under NEPA and Section 309 of the Clean Air Act (CAA). Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. In addition to environmental impacts, our review considers the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. Based on our review we are giving the DEIS a Lack of Objections rating.

We appreciate the Bank's efforts on this project to coordinate with members of the public, the Washington Department of Archaeology and Historic Preservation (DAHP), the U.S. General Services Administration and others. We note that, as EPA stated in our August 3, 2009 scoping comments on the withdrawn DEIS, we defer historic preservation issues on this project to the DAHP. Close coordination with the DAHP is necessary for this project because the Deputy State Historic Preservation Officer has determined this building to be eligible for listing in the National Register of Historic Places.

We appreciate the DEIS's updated "Energy" analysis. Additional information on "Regulatory Context - Federal Regulations", for example, is responsive to the recommendations EPA made on the withdrawn October 2009 DEIS.¹ The comparative analysis of greenhouse gas emissions for primarily office use versus primarily residential use also represents an improvement over the withdrawn October 2009 DEIS. The 2009 DEIS focused on emissions from office use only.

¹ [http://yosemite.epa.gov/oeca/webeis.nsf/\(PDFView\)/20090372/\\$file/20090372.PDF?OpenElement](http://yosemite.epa.gov/oeca/webeis.nsf/(PDFView)/20090372/$file/20090372.PDF?OpenElement)

Thank you for this opportunity to comment, if you have any questions or concerns, please contact me at 206-553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov .

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is written in a cursive style with a large, looped initial 'C'.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.