

March 15, 2010

Jeff Philliber, UC-LBNL Environmental Planner
Lawrence Berkeley National Laboratory (LBNL)
One Cyclotron Road, MS 76-234A
Berkeley, CA 94720

cc: Kim Abbott, Environmental Program Manager
Office of Science
Berkeley Site Office
1 Cyclotron Road MS 90-1023

re: Draft Environmental Impact Report for Seismic Life Safety, Modernization, and
replacement of General Purpose Buildings, Phase 2 Project, SCH# 2008122030

Dear Mr. Philliber and Ms. Abbott:

This is written in response to the invitation for public written commentary regarding the subject project, as required by the California Environmental Quality Act (CEQA) for a draft Environmental Impact Report (DEIR) and for all requirements of the National Environmental Protection Act (NEPA).

We hereby advise you of the hazards of the construction on the LBNL (Lab) site, as presently proposed in the subject DEIR. We also wish to emphasize the dangers to people, structures and vulnerable research facilities that may in any way contain hazardous materials, should this project be executed at the proposed LBNL site.

Regarding the geology of the site the observations cited in the DEIR concerning the adequacy for construction are seriously deficient. Lacking are geological studies for the General Purpose Laboratory (GPL) deep enough to provide any understanding of the geology below approximately three meters. Furthermore the severe destruction to the Lab infrastructure is predictable due to the mercurial geology and steepness of the Lab site.

Of primary concern should be the fact that an earthquake is now predicted to be imminent on the Hayward Fault trace. That trace runs completely through the lower west side of the Lab site. When the event occurs, it is predicted to destabilize the entire Lab site. CEQA establishes significant relevant criteria for impacts. It asks if the impact of the proposed project related to geology and soils would be considered significant. Certainly it would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving

- a) rupture of a known earthquake fault
- b) strong seismic shaking
- c) seismic-related ground failure, including liquefaction
- d) landslides

The attachments will describe the underlying geology of the LBNL site which should convince you that:

1. No new buildings of any kind should be constructed on the present LBNL site.
2. A plan to relocate all the existing facilities to a safer location, preferably well west of the known Hayward Fault trace should be instituted
3. The available UC Richmond Field Station site should be seriously considered.

Very truly yours,

Garniss Curtis, PhD, Professor Emeritus, Earth and Planetary Sciences, UCB

Georgia Wright, PhD,

John R. Shively, P.E.,