

**CEQA FINDINGS OF FACT AND
STATEMENT OF OVERRIDING CONSIDERATIONS
REGARDING THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
CONSOLIDATED CORRECTIONAL TREATMENT FACILITY
(MEN'S CENTRAL JAIL REPLACEMENT PROJECT)
STATE CLEARINGHOUSE NO. 2015061045**

Exhibit A

1.0 INTRODUCTION

The California Environmental Quality Act (CEQA, California Public Resources Code §§ 21000 *et seq.*) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. The potential environmental effects of the proposed Consolidated Correctional Treatment Facility (CCIF or Proposed Project) have been analyzed in a Draft Environmental Impact Report (Draft EIR) (State Clearinghouse [SCH] No. 2015061045) dated October 2017. A Final EIR has also been prepared that incorporates the Draft EIR and contains the comments received on the Draft EIR, responses to the individual comments, revisions to the Draft EIR including any clarifications based on the comments and the responses to the comments, and the Mitigation Monitoring and Reporting Program for the Proposed Project (MMRP). This document provides the findings required by CEQA for approval of the Proposed Project.

1.1 STATUTORY REQUIREMENTS FOR FINDINGS

The CEQA (Pub Res. Code §§ 21000, *et seq.*) and the State CEQA Guidelines (Guidelines) (14 Cal. Code Regs §§ 15000, *et seq.*) promulgated thereunder, require that the environmental impacts of a project be examined before a project is approved. Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
 - (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subsection (a) (2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a) (3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Guidelines Section 15091(a)(1) above, that are required in, or incorporated into, the project which mitigate or avoid the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal [sic] project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

1.2 CERTIFICATION

Having received, reviewed and considered the EIR for the CCTF (Men's Central Jail Replacement), State Clearinghouse No. 2015061045, as well as all other information in the record of proceedings on this matter, the Los Angeles County Board of Supervisors adopts the following Findings (Findings) and Statement of Overriding Considerations, in its capacity as the legislative body for the County of Los Angeles (County), which is the CEQA Lead Agency. The Findings and Statements of Overriding Considerations set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by the County and responsible agencies for the implementation of the Proposed Project.

In addition, the County of Los Angeles Board of Supervisors (Board) hereby makes findings pursuant to and in accordance with Section 21081 of the California Public Resources Code and State CEQA Guidelines Sections 15090 and 15091 and hereby certifies that:

- (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the Final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

1.3 PROJECT ENVIRONMENTAL REPORT AND DISCRETIONARY ACTIONS

The Final EIR addresses the direct, indirect, and cumulative environmental effects of construction and operation activities associated with the Proposed Project. The Final EIR provides the environmental information necessary for the County to make a final decision on the requested discretionary actions for all phases of this Project. The Final EIR was also intended to support discretionary reviews and decisions by other responsible agencies, including the Board of the State and Community Corrections (BSCC). Discretionary actions to be considered by the County may include, but are not limited to, the following:

- Certify that the Final EIR for the Proposed Project has been completed in compliance with CEQA, and reflects the independent judgment and analysis of the County; find that the Board has reviewed and considered the information contained in the Final EIR prior to approving the Project; adopt the Mitigation Monitoring and Reporting Program, finding that the Mitigation Monitoring and Reporting Program is adequately designed to ensure compliance with the mitigation measures during project implementation; and determine that the significant adverse effects of the Project either have been reduced to an acceptable level, or are outweighed by the specific overriding considerations of the project as outlined in the CEQA Findings of Fact and Statement of Overriding Considerations, as set forth herein.
- Approve the Proposed Project and related discretionary actions needed for project construction and operation, such as allocating funding for the Proposed Project.

2.0 PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The County published a Draft EIR on October 19, 2017. A Final EIR was prepared in the winter and spring of 2017 and 2018 in compliance with CEQA requirements. The Final EIR has been prepared in accordance with CEQA and the CEQA Guidelines, as amended. As authorized in State CEQA Guidelines Section 15084(d)(2), the County retained a consultant to assist with the preparation of the environmental documents. County staff from multiple departments including but not limited to the Los Angeles County Sheriff's Department (LASD), Department of Public Works (DPW), Department of Public Health, and the Chief Executive Office (CEO), representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The Final EIR reflects the County's independent analysis and judgment. The key milestones associated with the preparation of the EIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the EIR and to solicit comments on the results of the environmental analysis presented in the Draft EIR.

2.1 PUBLIC NOTIFICATION AND OUTREACH

2.1.1 Notice of Preparation and Scoping

The County determined that an EIR would be required for the Proposed Project and issued a Notice of Preparation (NOP) on June 17, 2015. Pursuant to CEQA Guidelines Section 15060(d) and 15063 that allow lead agency to skip preparation of an Initial Study and begin work directly on the EIR process, a NOP was issued without accompanying Initial Study. The public review period for the NOP extended from June 17, 2015, to July 17, 2015. A scoping meeting was held on June 30, 2015.

The NOP and Scoping Meeting notice were sent to all responsible/trustee agencies and individuals that had requested to be informed about the Proposed Project in order to solicit feedback from federal, State, regional, and local government agencies and interested parties on the scope and content of the Draft EIR for the Proposed Project. The NOP was also sent to property owners and occupants within a 500-foot radius of the Project Site and the Spring Street Parking Structure (SSPS) Site. The NOP and Notice of Scoping Meeting was published in the Los Angeles Daily News on June 25, 2015. Copies of the NOP were also made available at the County website at ftp://dpwftp.co.la.ca.us/pub/pmd/MenCentralJailRepl_CCTF, the County of Los Angeles Public Information Office, the Anthony Quinn Branch Library, the Chinatown Branch Library, the Little Tokyo Branch Library, the Echo Park Branch Library, and the Central Library.

The Scoping Meeting was held on June 30, 2015 from 6 PM to 8 PM, at the Los Angeles County Hall of Records, 320 West Temple Street, Room 150, Los Angeles, CA 90012. Comments on the NOP were received from six agencies, which are included in Appendix B to the Draft EIR, and the specific issues that were contained in comments submitted on the NOP are summarized in Table 2-1, *NOP Comment Summary*, of the Draft EIR Section 2, *Introduction*, with references that direct the reader to the appropriate EIR Section for the topic. Topics of the NOP comments included air quality and health risks during construction and operation, railroad right-of-way encroachment, drainage, traffic and transportation, noise and vibration, and wastewater, stormwater, and solid waste utility systems.

2.1.2 Public Review of Draft Environmental Impact Report and Public Outreach

Upon completion of the Draft EIR, notice of the public review period was given in accordance with Section 15087 of the CEQA Guidelines. The EIR eliminated detailed analysis of Agriculture/Forestry Resources, Mineral Resources, Population and Housing, and Recreation in Chapter 5, *Environmental Analysis*, of the Draft EIR, and substantiated the reasons for their elimination in Chapter 8, *Impacts Found Not to be Significant*, of the Draft EIR.

On October 19, 2017, a Notice of Availability (NOA) of the Draft EIR and Notice of Public Meeting was prepared and distributed to the State Office of Planning and Research, Los Angeles County Clerk, responsible and trustee agencies, organizations, interested parties, and all parties who requested a copy of the EIR in accordance with CEQA. The County decided to provide a voluntary extension beyond the CEQA-mandated 45-day public review period to a 60-day public review period beginning October 19, 2017, and ending December 18, 2017.

The NOA was distributed to the distribution list prepared for the NOP for the scoping stage of the Proposed Project before issuance of the EIR, and was augmented to include property owners and occupants within a 500-foot radius of the Vignes Lot and the agencies and interested parties requested

to be added to the list prior to the release of the NOA. The NOA and Draft EIR were posted on the County's website for viewing and downloading at <ftp://dpwftp.co.la.ca.us/pub/pmd/MenCentralJailReplCCTF/>. Newspaper advertisements of the NOA and EIR comment period and the information on a community meeting were placed in the following papers:

- Los Angeles Daily News – A daily publication. The NOA was published on October 19, 2017.
- Downtown News – A weekly publication. The NOA was published on October 23, 2017.
- La Opinion (in Spanish) – A daily publication. The NOA was published on October 19, 2017.
- World Journal (in Chinese) – A daily publication. The NOA was published on October 19, 2017.

Hardcopies of the Draft EIR and Spanish and Chinese-translated Executive Summary were available for viewing at the following locations:

- County of Los Angeles Public Information Office, Room 358, Kenneth Hahn Hall of Administration: 500 W. Temple Street, Los Angeles, CA 90012
- Anthony Quinn Branch Library: 3965 Cesar E. Chavez Avenue, Los Angeles, CA 90063
- Chinatown Branch Library: 639 N. Hill Street, Los Angeles, CA 90012
- Little Tokyo Branch Library: 203 S. Los Angeles Street, Los Angeles, CA 90012
- Echo Park Branch Library: 1410 W. Temple Street, Los Angeles, CA 90026
- Central Library: 630 W. 5th Street, Los Angeles, CA 90071

A public meeting to provide a Proposed Project overview and conclusions of the Draft EIR and status of the review process was held on October 30, 2017 at the Los Angeles County Department of Health Services Auditorium (located off 1st Floor Lobby), 313 North Figueroa Street, Los Angeles, CA 90012. Real-time Spanish, Chinese Mandarin, and Chinese Cantonese translation services were made available, as were copies of the NOA and the Executive Summary in English, Spanish, and Chinese Mandarin, and Chinese Cantonese.

In summary, the County conducted all required noticing and scoping for the Proposed Project in accordance with Section 15083 of the CEQA Guidelines, and conducted the public review for the EIR, which exceeded the requirements of Section 15087 of the CEQA Guidelines.

2.1.3 Final Environmental Impact Report and Board of Supervisors Proceedings

The County prepared a Final EIR, including the Responses to Comments to the Draft EIR. The Final EIR/Response to Comments contains comments on the Draft EIR, responses to those comments, revisions to the Draft EIR, and appended documents. A total of 127 comment letters were received, with 113 received during the public comment period and 14 received after the close of the comment period. Of the 113 comment letters received during the comment period, 3 letters were from public agencies, 3 letters were from organizations, 2 letters were inter-departmental letters from County departments, and 105 were letters from individuals. Many of the comments asserted that the County should not “build a new jail” and various community programs and diversion method should be

implemented to reduce inmate population and provide better mental health care for the community. The Final EIR reiterated that that the Proposed Project would not increase the number of jail beds, and is not proposing to build a new jail. Instead, a key objective of the Proposed Project is to provide a modern facility to address the growing mental health issues of the County's jail population by replacing the existing Men's Central Jail. The Final EIR also stated that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, as diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. Although not required under the scope of CEQA analysis, the County prepared a health risk assessment (HRA) pursuant to the South Coast Air Quality Management District's (SCAQMD) comment, and included it as an Appendix to the Final EIR. The HRA provided a comparison of the Project's potential exposure to carcinogenic and chronic non-carcinogenic hazards to the health risk thresholds established by Office of Environmental Health Hazard Assessment (OEHHA) and SCAQMD. In comparison to the threshold level of 10 in a million, the HRA determined that carcinogenic risks are below the significance threshold value for both inmates and employees, and the chronic non-carcinogenic hazards are also below the significance threshold. No new significant impacts were identified in the Final EIR.

The Final EIR found that prior to mitigation, implementation of the Proposed Project will result in potentially significant impacts to Air Quality, Cultural Resources, Hazards and Hazardous Materials, Noise, and Transportation and Traffic. However, mitigation measures (MMs) have been developed to avoid or reduce all of these impacts to levels considered less than significant, with the exception of Transportation and Traffic. The County prepared a Statement of Overriding Considerations for the impacts found to be significant and unavoidable (transportation/traffic for Off-site Parking Option 2 only).

Members of the public can view searchable agendas for scheduled Board of Supervisors meetings and access agenda-related County information and services directly on the following website: <http://bos.lacounty.gov/Board-Meeting/Board-Agendas>. This site has an email notification service enrollment process for copies of future Board of Supervisors agendas.

The Final EIR document will be posted for viewing and download with the previously posted Draft EIR prior to the County's consideration of the Final EIR and Project recommendations on the same website noted above for the posting of the Draft EIR: <http://dpw.lacounty.gov/go/cctfeir>.

A date for consideration of the Final EIR and project recommendations at the Board of Supervisors was set for the Proposed Project and notice of the meeting was provided consistent with the Brown Act (Government Code Sections 54950 et seq.). The Board of Supervisors will take testimony on the Proposed Project and may continue a matter on its calendar to a subsequent meeting date in its discretion.

2.2 RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the record of proceedings for the Proposed Project (Record of Proceedings) consists of the following documents and other evidence, at a minimum:

- The Notice of Preparation distributed by the County on June 17, 2015;

- The EIR for the Proposed Project, including, without limitation, the Draft EIR, Final EIR, and all of its appendices;
- All documents, studies, EIRs, maps, rules, regulations, guidelines, permits and other documents and materials incorporated by reference in any portion of the EIR;
- All written and oral public testimony presented during every noticed public meeting and public hearing for the Proposed Project, and all transcripts, audiotapes, videotapes and digital tapes thereof;
- The Mitigation Monitoring and Reporting Program for the Proposed Project;
- Matters of common knowledge to the County, including but not limited to federal, state and local laws and regulations, including, without limitation, the County Code, Zoning Code, Ordinances, Resolutions, and adopted CEQA Procedures;
- Any documents expressly cited in these Findings and/or in the Statement of Overriding Considerations; and
- All materials not otherwise identified which are expressly required to be in the Record of Proceedings by Public Resources Code Section 21167.6(e).

2.3 CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials which constitute the Record of Proceedings are located at the County of Los Angeles, Chief Executive Office, 500 West Temple Street, Room 754, Los Angeles, California, 90012. The County Chief Executive Office is the custodian of the Record of Proceedings. Copies of those documents are and at all relevant times have been and will be available upon request at the offices of the Chief Executive Office. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and Guidelines § 15091(e).

2.4 PROJECT INTRODUCTION AND NEED

The County CEO, the LASD, the County Health Agency, and the DPW have been evaluating various strategies to reconfigure and/or modernize the County's jail facilities in order to enhance inmate security, supervision, and inmate and officer safety by providing housing which meets the classification and correctional needs of the inmate population; to stabilize the inmate population; and to ensure compliance with facility and program legal requirements. The evaluation of the County's jails over the past decade has been motivated by inmate overcrowding, the need to update or replace older jail facilities, and the need to address housing for low-level offenders set forth by the state's 2011 Public Safety Realignment Program (Assembly Bill [AB] 109) and other requirements. Moreover, the County's evaluation confirmed a growing need for mental health and substance use disorder treatment within County correctional facilities (Vanir 2013, HMA 2015). AB 109 allowed for inmates convicted of non-violent, non-serious, and non-sexual crimes to serve their sentence in county jails rather than state prisons. The state's realignment plans provide a solution for reducing the number of inmates in the state's prison system, as ordered by the U.S. Supreme Court. As such, the LASD is tasked with the mandate to accommodate these inmates that formerly would have been serving sentences in the state prison system.

LASD operates seven jail facilities with a BSCC rated capacity of 12,537 beds. When including the 336 short-term beds available in the County's Inmate Reception Center (IRC), currently located at the Twin Towers Correctional Facility (TTCF) and the 80 booking beds available at the Century Regional Detention Facility (CRDF), a total of 12,953 short- and long-term beds are in the County-wide system. In recent years, LASD has encountered significant challenges in providing inmate services due to a lack of adequate space, antiquated construction and physical infrastructure design.

Vanir Construction Management Inc. (Vanir) was commissioned by the County to provide an independent review of the County's jail plan for addressing County-wide management of the jail system and inmate population. The Los Angeles County Jail Plan Independent Review and Comprehensive Report (2013 Jail Plan Report) dated July 3, 2013, provided a conceptual evaluation of the needs of the County jail system, including a list of Jail Plan Options for the County Board of Supervisors (Board) to consider (Vanir 2013). All of the options identified in the 2013 Jail Plan Report contained a new consolidated medical and mental health correctional treatment facility located downtown, near the existing MCJ site and TTCF. The Jail Plan Report identified and described several critical needs and components required of this new facility to provide comprehensive medical and mental health care, along with related mental health treatment programs. The medical and mental health elements should include mental health crisis beds, intensive care unit, a step-down unit, substance use disorders treatment program, and medical outpatient specialty housing. Additionally, it was contemplated that the new facility would be flexibly designed to accommodate its desired uses including space for treatment programs, auxiliary support services, and non-treatment related support services.

The 2013 Jail Plan Report determined that, in light of trends analyzed for population, crime rates, arrests, bookings and projections of the AB 109 inmate population as "N3" (i.e., non-violent, non-serious, non-sexual), the County jail system is projected to remain at or near its current inmate population level (Vanir 2013). Because the LASD inmate population varies from day to day and the total inmate population is also affected by policy decisions, the Jail Plan Report initially determined a 4,860-bed CCTF to be adequate and appropriate.

Diversion and the County's Office of Diversion and Reentry

On June 9, 2015, the Board instructed the CEO to provide an independent analysis of the number of treatment beds and other types of beds needed at the new CCTF, assess the likely impacts to the County jail population from legislative or significant programmatic developments, and conduct a capacity assessment of all community-based alternative options for treatment. Subsequently, the Board retained Health Management Associates (HMA) to prepare the independent analysis. In September 2015, the Board implemented a comprehensive jail diversion plan, including but not limited to establishment of an Office of Diversion and Reentry. The Office is responsible for oversight and coordination of all County-wide diversion of persons who have mental illness or substance use disorders, creation of a more standardized diversion assessment tool that all County departments and key private provider partners would use to triage persons with mental illness and substance use issues and persons who are homeless, to determine which services (including housing) are most appropriate. (Los Angeles County 2015). This Office is located in the County Health Agency with a broad mission to reduce the population of the mentally ill and those with substance use disorders in County jails by connecting them with community-based treatment and housing. This is a countywide criminal justice diversion program for these populations.

The County has demonstrated a continued and increased focus on diversion from incarceration as it considers this Proposed Project. One of the key goals of the diversion program is to divert mentally ill people from jail to community mental health treatment programs whenever it is more appropriate including prior to booking, during the intake mental health assessment process, or if determined at any time during incarceration. In conjunction with the diversion program, the Board also reduced the maximum proposed capacity for purposes of environmental review for the proposed CCTF from 4,860 beds to 3,885 beds with the majority of the beds dedicated for mental health treatment and substance use disorders and detoxification needs.

The existing MCJ is located across the street from TTCF, which consists of the two jail towers, an inmate reception center (IRC), and the Correctional Treatment Center (CTC). The IRC's intake function assesses, classifies, and assigns inmates to housing for all of the County's custody facilities and processes inmates for release. All County custody facilities send inmates to IRC to sort and stage inmates for court appearances as part of court-line process. The IRC is also responsible for the processing of inmates remanded to LASD custody from the courts and the transfer of inmates to state and outside facilities. TTCF and CTC currently house the majority of the County's mental health inmates, and inmates requiring treatment at the TTCF and CTC are ideally identified during the initial assessment process. The co-location of the IRC, TTCF, and MCJ is ideal for efficient processing, treatment, and stabilization of the large number of new inmates entering the system, the inmates requiring court appearances, and the number of inmates discharged from the system.

2.5 PROJECT LOCATION

The CCTF, the Proposed Project, would replace the existing Mens' Central Jail (MCJ) at the same location, a 17.7-acre site owned by the County and bordered by Bauchet Street to the east, North Vignes Street to the south, and train tracks to the west and north in the City of Los Angeles (Project Site). Street addresses for the Project Site include 429, 433, 441, 506, 510, and 550 East Bauchet Street, and 1000 and 1020 North Vignes Street.

Across Bauchet Street to the south of the Project Site is the TTCF, consisting of two jail towers, an IRC, and the CTC.

2.5.1 Off-Site Parking: Spring Street Parking Structure Site (Option 1)

The EIR analyzed the potential construction of the SSPS (up to 1,500 spaces), located at 725, 739, and 747 North Spring Street. The SSPS Site is an existing County-owned surface parking lot on 1.66 acres that occupies the central portion of the block bounded by Spring Street on the east, New High Street on the west, Ord Street on the south, and Alpine Street on the north. It is approximately 0.6 mile west of the Project Site. If Option 1 is implemented, no parking structure would be constructed on the Vignes Lot as described in Option 2 below.

2.5.2 Off-Site Parking: Vignes Lot (Option 2)

The EIR also analyzed the potential construction of an off-site parking structure (up to 3,000 spaces) at the Vignes Lot—approximately 4 acres of vacant land 200 feet northwest of Project Site, at 1060 North Vignes Street in the City of Los Angeles—for parking and/or other noncustodial, project-related uses during project construction and operation. This option would include the design and construction of a multi-story parking structure for staff and visitors associated with the CCTF or

TTCF. Under this option, a connection between the proposed Vignes Lot parking structure and the CCTF would also be provided. If Option 2 is implemented, no parking structure would be constructed at the SSPS Site as described in Option 1 above.

2.6 PROJECT OBJECTIVES

The County proposes to reuse the existing MCJ site and replace MCJ with a new, safe, therapeutic, and rehabilitative facility to be called the CCTF, which emphasizes treatment, meets current correctional standards and provides comprehensive on-site treatment for male and female inmate-patients. Unlike the regular inmate populations that do not require specialized treatment, inmate-patients refers to inmates with mental health, medical, substance use, and co-occurring disorder needs. Project goals include a design based on the projected numbers of inmate-patients requiring specialized treatment, and an infrastructure system with the flexibility to respond to any future trends in treatment, or re-entry support, while focusing on reducing recidivism. Therefore, the following objectives have been established by the County for the Proposed Project and will aid decision makers in their review of the project and associated environmental impacts:

- A. To construct a modern correctional detention treatment facility that incorporates the best industry practices in care, safety and design features to minimize unnecessary injury, illness, and/or harm to inmate-patients, staff, and visitors.
 1. To provide a safe environment for inmate-patients, visitors, and staff.
 2. Reduce County exposure to preventable jail-related liability claims. Prevent and/or substantially reduce at-risk inmate-patients suicide.
 3. Design criteria that provide a more therapeutic environment with treatment centric features to enhance the lives of inmate-patients.
 4. Improve safety of public, staff, and inmate-patients through design and operational best practices that meet BSCC and applicable correctional standards.
- B. To prioritize the on-site integration of inmate-patient programming, treatment, and management through building design, resulting in a best practice standard of care for inmate-patients with mental health, medical, substance use, and co-occurring disorder needs.
 5. Provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities on-site to achieve proximity and to focus on the highest risk inmate-patients with such treatment needs.
 6. Provide both treatment program space and clinical staff resources at the Housing Unit level.
 7. Strive to reduce recidivism by providing on-site mental health, medical, and substance use disorder treatment services, educational programs, and re-entry support resources.
 8. Provide a new Inmate Reception Center (IRC) to expedite inmate-patient processing and speed the arrival of incoming inmate-patients to the appropriate housing for treatment. The IRC will implement the medical/mental health screening at the beginning of the booking

process allowing inmate-patients to have their medical and/or mental health issues addressed early.

- C. To provide treatment and detention capacity for both male and female inmate-patients requiring enhanced specialized access to mental and/or medical care.
 - 9. Conform to all minimum space standards and other state and federal legal requirements in the facility design, including BSCC and Americans with Disabilities Act (ADA) standards.
 - 10. Maximize accessibility for the physically impaired.
 - 11. Provide a flexible infrastructure that can respond to unforeseen changes in inmate populations.
- D. Maximize the financial and facility resources available to the County to construct, maintain, and operate a new treatment facility within the County's detention system.
 - 12. Minimize land acquisition, entitlement, and other siting costs. Avoid new land use conflicts by prioritizing the reuse of County-owned detention property.
 - 13. Maintain proximity to downtown Los Angeles courts, TTCF, Los Angeles County/University of Southern California (LAC+USC) Medical Center, and other County and community support services for inmate-patients with mental health, medical, and substance use disorder treatment needs.
 - 14. Minimize inmate-patient movement both within the facility and to offsite facilities by locating health and other rehabilitative services on-site where appropriate.
 - 15. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF facility and the TTCF. Co-locate the Medical Outpatient Specialty Housing (MOSH) (nursing care beds), the CTC, and the Medical Clinic to maximize system-wide resources efficiently.
 - 16. Optimize the County's costs to fund mental health, medical, and substance use disorder treatment facilities for inmate-patients, including long-term operations and maintenance costs.
 - 17. Comply with the County's Energy and Environmental Policy and achieve a minimum of LEED Gold certification for the project.

2.7 PROJECT DESCRIPTION

The County proposes to reuse the existing MCJ site to develop and operate a new CCTF with no more than 3,885 inmate-patient beds and up to 2.4 million square feet of building space. The CCTF would be developed with multiple mid- and high-rise buildings not to exceed 400 feet in height. The existing MCJ is antiquated and functionally obsolete. The CCTF would consist of a new correctional treatment facility that provides integrated LASD and County Health Agency staff support functions and incorporates emerging practices to provide mental-health, substance-use-disorder, and medical treatment and educational programs for male and female inmate-patients.

Upon completion of the Proposed Project, male and female inmates in the County jail system who require the most critical mental health treatment—from acute crisis care to high and medium observation/step down care and medical nursing care—would be housed at CCTF. Male and female inmates requiring acute medical and nursing care would also be housed and treated at CCTF. The substance use disorder program at CCTF would be provided to selected male and female inmates - patients prior to their release. CCTF would also include high-security housing for the most serious offenders and inmates-patients requiring separation from the general population for their own protection. All inmate-patients with co-occurring disorders, including high-security inmates, would be provided multiple treatments and programs, as required. All inmate-patients would be given opportunities to participate in the County’s Education Based Incarceration program and reentry counseling.

The CCTF would also employ a direct supervision model for housing and programming (except high security and high observation housing). Instead of the traditional monitoring of inmates from an enclosed staff station, the staff would share a workspace located inside of the housing units. This arrangement is to provide increased interaction between inmate-patients and staff. Direct supervision also affords increased observation of inmate patients by staff, potentially reducing inmate-on-inmate violence.

Furthermore, the new IRC would feature an “Open Booking” concept where medical, mental health, and classification services would be co-located. The current linear process results in “batching” of inmate-patients versus a more individualized approach. Inmate-patients identified with urgent medical and mental health conditions or those who are uncooperative or disruptive would be placed in a “safe assessment” processing line to expedite access to treatment at the Urgent Care Clinic or housing. The IRC would also feature an enhanced integration of current release services and programs. The goal is to provide inmate-patients with increased access to existing and potentially new services and programs to reduce recidivism.

The CCTF would utilize a multidisciplinary team approach. The County Health Agency in partnership with the LASD custody staff would work together to create a therapeutic environment that provides the most effective medical, mental health and substance use programming. This programming would focus on group interventions; integration of mental health, substance use disorder, and medical care treatments; and coping skills so that the inmate-patient can transition to a lower level of care. The County Health Agency would have primary responsibility for treatment of all inmate-patients with healthcare needs within the CCTF. The treatment programs within the CCTF would create a continuum of treatment intensity, with the CTC the most intense and the Moderate Observation Housing (MOH) and MOSH dormitories the least.

Treatment Programs and Services

Substance Use Disorder (SUD) Treatment Program. Upon intake, inmate-patients would be evaluated at the IRC and, if required, initially treated in medical detoxification housing. The SUD treatment program would then provide longer-term treatment to inmate-patients in their housing units. Many mentally ill inmate-patients have co-occurring substance use disorder issues. The County Department of Public Health, Substance Abuse Prevention and Control (DPH-SAPC), would oversee the intensive SUD treatment programs.

Mental Health Services. The CCTF Mental Health Treatment Program (MHTP) would incorporate emerging practices in jail mental health care, including optimal facility and program design, curricula, and staffing in a safe and secure correctional environment. MHTP would use a multidisciplinary team approach to create a therapeutic environment that maximizes mental health programming, with a focus on group interventions; integration of mental health, substance use disorder, and medical care; release planning; and inclusion of community providers. The goals of the MHTP would be to provide a therapeutic environment and individualized services in the clinically least-restrictive level of care to stabilize the inmate-patients' mental illness, engage them in treatment, teach skills and behaviors that optimize functioning in jail and upon return to the community, promote release readiness and community reintegration, and reduce recidivism.

Education Based Incarceration (EBI). The Education Based Incarceration (EBI) program would help inmate-patients realize their potential by creating a custody setting that offers educational opportunities and life-skills programs.

On-Site Specialty Medical Services. Various services would provide for the needs of the CCTF population—recognizing many mentally ill inmate-patients require high levels of medical care, including medication and/or laboratory services. Specialty services would include Urgent Care and Specialty Care Clinics, including dialysis, HIV clinic, dental, vision, laboratory, and orthopedics. These services would be located together and easily reachable within the primary security perimeter. Additional services for routine medical treatment would be provided on the housing floors.

Therapeutic Environmental Features

The CCTF would feature ample natural light, reduced noise interference, and increased privacy where practical. The therapeutic environmental features would also contribute to the quality of the work environment for staff. Recreational space would be provided.

Project Facilities and Operations

The Project Site is currently developed with one 1960s- and one 1970s-era jail with a combined building. The average inmate daily population at MCJ between 2006 and 2014 was 4,782; in 2015 the average inmate daily population was 4,220; and the average inmate daily population for 2016 was 4,213.

Compared to the 1960s and 1970s when MCJ was built, current California standards for the design and operation of jails require more square feet per inmate in cells, dormitories, dayrooms, and recreation yards; more program and recreation time; and more windows and natural daylighting. Additionally, the greater size and cost of the proposed CCTF compared to the traditional jails reflect new, improved, evidence-based jail facility standards and expanded mental-health and substance-use-disorder treatment, medical treatment, and program spaces.

Housing Unit Types

Different treatment bed types in housing units are proposed at CCTF and provide a continuum of care levels. The total proposed CCTF bed count of 3,885 beds is distributed as follows: correctional treatment center (CTC) Mental Health: 240 beds; CTC Medical: 120 beds; HOH: 840 beds; Moderate Observation Housing (MOH): 1,800 beds; Medical Outpatient Specialty Housing (MOSH): 480 beds; Medical Detoxification: 200 beds; and HSH: 205 beds.

CCTF Support Facilities

The CCTF would include the following support facilities improvements:

- **Administrative Center.** CCTF campus executives and administrative offices for County Health Agency and LASD staff.
- **Arraignment Court.** This includes replacement of the Central Arraignment Court for criminal matters, including hearings for parole violations and Post-release Community Supervision violations.
- **Support Services.** These include staff services, food services, maintenance shops, and warehouses. These services require access to all housing areas and access for service and delivery vehicles.
- **Parking Structures.** This includes on-site parking and two off-site parking options. The existing 4-story and 10-story parking structures would be retained under either option. Parking Option 1 and Option 2 are described in greater detail in Section 1.3.4.
 - Under Option 1, a parking structure providing up to 1,500 spaces would be constructed at the SSPS Site; this parking structure would be used by CCTF and TTCF staff and visitors during construction of the CCTF. Upon completion of the CCTF, the SSPS would be available for other County uses. A new 3,000-space parking structure would be constructed on the Project Site for long-term use by CCTF and TTCF staff and visitors.
 - Under Option 2, a new 3,000-space parking structure would be constructed on the Vignes Lot for long-term use by CCTF and TTCF staff and visitors, and other County uses.
- **On-Site Circulation.** Including court-line and bus queuing area, emergency access, loop road, and vehicle driveway on North Vignes Street between Bauchet Street and the North Vignes Street grade separation. The Project includes closure of a portion of Bauchet Street to restrict access to public traffic beyond entry to future visitor parking.
- **Central Utility Plant. (CUP)** – The existing central heating plant would be replaced with a central utility plant (CUP) to serve both CCTF and TTCF.
- **Secure Pedestrian Connection to TTCF.** The existing secure pedestrian bridge connecting MCJ and TTCF across Bauchet Street would be replaced with either a new bridge or a tunnel under Bauchet Street to connect CCTF and TTCF for continued secure movement of inmates for intake and release, and transportation to court or other correctional facilities, housing, and medical treatment.
- **Pedestrian Improvements.** Under Option 2, pedestrian improvements would be completed to connect the new off-site parking structure on the Vignes Lot to the CCTF. These improvements could include a bridge over the existing railroad tracks, a tunnel under the existing railroad tracks, and/or pedestrian improvements along North Vignes Street.

- **Other Facilities.** Other facilities at the CCTF would include security elements/lighting, communications elements, and helistops for all buildings exceeding 75 feet in conformance with the County Fire Code.

Inmate Visitation

The CCTF would provide inmate-patients and visitors with four types of visitation: 1) contact visits, 2) noncontact visits, 3) video visits, and 4) professional visits. Contact visits provide opportunities for inmates and visitors to interact face to face, allowing physical contact. In noncontact visitation, the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits are long-distance visitations through a video conferencing program, allowing the inmate and the visitor to hear and see each other via a computer and screen. Professional visits would include meetings with the inmate-patient's lawyers, mental health professional, and/or court-assigned representatives.

The MCJ currently does not offer contact visitation. Inmates are moved from their housing units to a visiting center where noncontact visits are conducted. The CCTF would provide infrastructure to accommodate noncontact and professional visitation on each housing floor, that is, to bring screened visitors to the inmate-patients rather than the other way around. This arrangement would be more staff efficient and would eliminate the need for inmate-patients to leave their housing areas.

Video visitation would also be conducted within the housing unit or the noncontact visiting area on each housing floor. The County currently has publicly available video visiting stations inside various County facilities, and the CCTF would include such video visiting stations on-site. Contact visitation would be provided for inmate-patients who meet LASD-approved criteria. Individual enclosed visiting rooms, observed by staff, would allow an inmate-patient to visit family members or an attorney in a private setting.

CCTF Staffing

The existing MCJ is currently operated in three 8-hour shifts: AM (6 AM to 2 PM), PM (2 PM to 10 PM), and Early Morning (10 PM to 6 AM). The CCTF would also operate in these three shifts. The CCTF, TTCF, and IRC would be staffed 24 hours a day, 7 days a week. The majority of staff require relief prior to ending their shift, because arriving staff must dress, be briefed by the previous shift's staff, and assume control of the post, creating an overlap between shifts.

The Proposed Project would relocate the existing CTC and IRC from TTCF to the new CCTF across the street. Although TTCF is not a part of the Proposed Project, implementation of CCTF would result in a reduction of staff at TTCF. At completion, the Proposed Project would be served by 730 Early Morning shift staff, 2,236 AM shift staff, and 1,181 PM shift staff, increasing the respective staff per shift by 79, 212, and 147. Total proposed staffing of 4,147 exceeds the current MCJ staffing of 3,709 by 438 staff. However, due to the relocation of the mental health treatment beds from TTCF to CCTF, existing staffing at the TTCF would be reduced by 388 staff. Overall staffing at CCTF and TTCF would increase from 5,729 to 5,779, an increase of 50 staff.

Parking

The Proposed Project includes two options for construction and operations parking requirements. The existing 4-story and 10-story parking structures serving MCJ and TTCF would remain under either off-

site parking option. During the demolition of MCJ and construction of the CCTF, either the SSPS Site (Option 1) or the Vignes Lot (Option 2) would be used. This construction-phase parking would provide approximately 1,500 parking spaces. Upon completion of the CCTF, the proposed operations-phase parking for the CCTF would include up to 3,000 new parking spaces on-site under Option 1 or up to 3,000 new spaces off-site on the Vignes Lot under Option 2.

Off-Site-Parking: Spring Street Parking Structure (Option 1)

Under Option 1, the Proposed Project includes the design and construction of an expanded multi-story off-site parking structure on a current single-level parking lot approximately 0.6 mile west of the Project Site. This proposed parking structure would be located at the 1.66-acre, County-owned SSPS Site and would be used for general, current, and long-term County and public parking needs, including interim parking uses during construction of area projects. During construction, shuttles would be used to link this parking supply with the portions of MCJ that would remain in operation during phased construction; they would also be used by employees and visitors to TTCF. The existing surface parking lot provides 255 spaces and is accessed via one driveway on North Spring Street. It is anticipated that the SSPS would have four or five above-grade levels and one below-grade level, and would provide 1,200 to 1,500 spaces. Vehicular access to the SSPS Site would be provided on both North Spring Street and New High Street. Upon completion of CCTF, a new parking structure with up to 3,000 spaces would be constructed on the Project Site, and the SSPS would be used for general County and public parking needs. Under Option 1, project implementation would not include a parking structure at the Vignes Lot.

Off-Site Parking: Vignes Lot (Option 2)

Under Option 2, the Proposed Project includes the design and construction of an off-site parking structure with seven or eight above-grade levels on the Vignes Lot, approximately 200 feet northwest of the Project Site. No shuttles would be needed to link this parking site to the facilities. During demolition and construction, the Vignes Lot would provide up to 1,500 parking spaces, and it would provide up to 3,000 spaces at ultimate buildout of the CCTF. The Vignes Lot parking structure would accommodate parking demands for staff and visitors of both the CCTF and TTCF. It is anticipated that vehicular access to the Vignes Lot would be provided on North Vignes Street, on North Alhambra Avenue, and on East College Street. A pedestrian connection between the Vignes Lot and the CCTF would be constructed, consisting of: 1) pedestrian improvements on North Vignes Street; 2) a bridge over the railroad tracks connecting the Vignes Lot to the Project Site; and/or 3) a tunnel under the railroad tracks connecting the Vignes Lot to the Project Site. Utility connections (e.g., conduit) between the CCTF and the Vignes Lot would also be installed. If Option 2 is implemented, there would be no parking structure built at the SSPS Site.

3.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

3.1 ISSUES DEEMED NO IMPACT OR LESS THAN SIGNIFICANT IMPACT IN THE NOTICE OF PREPARATION

Pursuant to CEQA Guidelines Section 15060(d) and 15063 that allow a lead agency to skip preparation of an Initial Study and begin work directly on the EIR process, a NOP was issued without accompanying Initial Study. All topical areas of evaluation included in the Environmental Checklist in

Appendix G of the CEQA Guidelines were determined to require further assessment in an EIR with the exception of Agriculture/Forestry Resources, Mineral Resources, Population and Housing, and Recreation.

Accordance with Section 15128 of the CEQA Guidelines, as described in Chapter 8 of the Draft EIR, the County concluded that project impacts related to the following issues would be less than significant: Agriculture/Forestry Resources, Mineral Resources, Population and Housing, and Recreation.

- **Agriculture/Forestry Resources:** The Project Site is already developed as a County jail facility and would continue to operate as a County jail facility. The Project Site is zoned PF (Public Facilities). The SSPS Site is currently developed as a surface parking lot and zoned C2-2 (Commercial). The Vignes Lot was previously developed with heavy manufacturing uses and is almost entirely covered by concrete. The Vignes Lot is zoned M3-1-RIO (Heavy Industrial). As stated, the Project Site, SSPS Site, and Vignes Lot are already developed with urban uses and not designated as special status farmland by the California Important Farmland Finder (DOC 2014) or forest land. No agricultural use or forestry uses would be impacted by the Proposed Project. No significant impact related to agricultural or forestry resources would occur.
- **Mineral Resources:** The Project Site and SSPS Site are already developed, and not mining extraction sites. The Vignes Lot was previously developed with heavy manufacturing uses and was never used for mineral extraction. Implementation of the Proposed Project would not result in the loss of availability of a known mineral resource. No significant impact related to mineral resources is anticipated.
- **Population and Housing:** The Project Site is already developed as a County jail facility and would continue operate as a county jail facility, serving approximately 20% fewer inmate-patients. The SSPS Site is currently developed as a surface parking lot and would continue to operate as a parking facility. The Vignes Lot would be used for a 3,000 space parking structure. The Proposed Project would increase the number of employees at the Project Site and the adjacent Twin Towers Correctional Facility by 50 employees. With an unemployment rate of 5.5 percent in the City and 5.2 percent in the County as of June 2016 (EDD 2016), new hires could be filled by the available unemployed local labor force of 110,600 persons in the City of Los Angeles and the unemployed labor force from other areas in the County and region, based on individual eligibility for the vacant positions and the County Sheriff's Department hiring protocol and requirements. The number of jobs available in the City of Los Angeles would increase by 50 positions from 1,753,558 jobs in 2013 (SCAG 2015). The increase would be within Southern California Association of Governments (SCAG) projections of 2,169,100 jobs by 2040 (SCAG 2016). The Project would not result in substantial employment growth in the City beyond what SCAG has projected for 2040. There would be no exceedance of SCAG's population projections for the City for 2040, and no substantial employment growth would occur with the Project. Therefore, the Proposed Project is not a growth-inducing project, and no significant impact would occur.

The Proposed Project would not require demolition of any residential units and would not result in displacement of any people. New employees may seek housing opportunities in the City or County. As of January 1, 2016, there are 85,486 vacant housing units in the City, representing a vacancy rate of 5.9 percent (DOF 2016). The vacancy rate for the County as a whole is 5.6 percent.

There is available housing in the City and County to accommodate new employee housing. The Proposed Project would not necessitate the construction of replacement housing, and no significant impact would occur.

- **Recreation:** The Proposed Project involves redevelopment of the existing MCJ and would not create new or increased demands for recreational facilities. Demands for recreation facilities are typically generated when there is residential growth in the area. The proposed CCTF would not increase the use of any parks or any other recreational facilities in the area. No significant impact would occur.

3.2 FINDINGS ON "NO IMPACT" AND "LESS THAN SIGNIFICANT IMPACTS"

Based on the environmental issue area assessment in the Final EIR, the County has determined that the Proposed Project will have no impact or a less than significant impact, including direct, indirect, and cumulative impacts, for the environmental issues summarized below. The rationale for the conclusion that no significant impact would occur in each of the issue areas is based on the environmental evaluations in the listed topical EIR sections in Section 5.0 of the Draft EIR, which include Environmental Setting, Environmental Impacts, Cumulative Impacts, and Mitigation Measures.

Project Design Features (PDFs) and Regulatory Requirements (RR) are listed and numbered in the Draft EIR. PDFs are specific design elements incorporated into the Project that are included in the Project's contractor specifications and final plans, which are implemented in accordance with County protocol to prevent the occurrence of, or reduce the significance of, potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures as defined by the CEQA.

RRs include applicable local, State, or federal regulations that are required independently of CEQA review and also serve to prevent the occurrence of, or reduce the significance of, potential environmental effects. Typical RRs include compliance with the provisions of the California Building Code, South Coast Air Quality Management District rules, local agency requirements, and other regulations and standards. However, both PDFs and RRs are identified in the MMRP or convenience of tracking to ensure compliance monitoring.

The EIR concluded that all or some of the impacts of the Proposed Project with respect to the following issues either will not be significant or will be reduced to below a level of significance by implementing project design features or existing regulatory requirements as detailed in Chapter 5 of the Draft EIR. Those issues include: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions (GHG), Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Transportation and Traffic, and Utilities and Service Systems. CEQA Guidelines Section 15091 requires that an EIR may not be certified for a project which has one or more significant environmental effects unless one of three possible findings is made for each significant effect. Since the following environmental issue areas were determined to have no impact or a less than significant impact, no findings are required for these issue areas.

3.2.1 Aesthetics

Finding. The Proposed Project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.1-1:** The Proposed Project would not have a substantial adverse effect on a scenic vista or alter scenic resources within a state scenic highway (Thresholds AE-1 and AE-2).

The nearest state-designated highway, SR-2, is approximately 10 miles north of the Project Site, SSPS Site, and the Vignes Lot (Caltrans 2011), and the city-designated scenic highway, Stadium Way (Los Angeles 2014a), and federally designated historic parkway, the Arroyo Seco Parkway segment of State Route 110 (SR-110) (FHWA 2014), are approximately 0.6 mile to the northwest of the Project Site and 0.45 mile and 0.5 to the north of SSPS and the Vignes Lot. The Proposed Project would not involve improvements to these highways, and therefore would not alter a scenic vista or scenic resources in a state scenic highway. Considering the distance from the state and locally designated scenic roadways, and the intervening development, the Project Site would not be visibly recognizable from this highway and would have a negligible effect on a scenic vista.

- **Impact 5.1-2:** The Proposed Project would alter but not degrade the visual appearance of the Project Site, SSPS Site, and Vignes Lot, and their surroundings (Threshold AE-3).

The Project Site is in downtown Los Angeles, which does not possess high-sensitivity views that are unique or special to the Los Angeles region. The Proposed Project would demolish all the existing development on the Project Site and construct new CCTF structures. As stated in RR AE-1, the County would also provide adequate street improvements and streetscape designs for the adjacent sidewalks and roadways. The Project Site and surrounding areas do not have a unique or protected visual character that would be adversely impacted by the new development during construction or operation. The Project Site is already fully developed with the existing MCJ and is not part of a protected scenic resource in any planning documents applicable to the City or the County. The construction would occur in multiple phases, alternating between demolition and building construction. Furthermore, the proposed buildings do not exceed 400 feet, which would be similar in height to the tallest building in the area, the Metro Gateway Building, at approximately 398 feet (Wikipedia 2016). Although there are residential units north of railroad tracks (i.e., along Bolero Lane within the William Mead Homes area), their current views consist of railroad tracks, power lines, multi-story parking structures, and the block wall of the MCJ. The Project Site would continue to be visible from these residential uses, but views of the new structures would not be considered a substantial degradation of the existing views, as the new CCTF building would present a similar cityscape from these vantage points and would be compatible with the views of the surrounding structures. The MCJ structures do not possess any special aesthetic quality that add to the viewing experience of the sensitive receptors and the Proposed Project would provide building with similar visual characteristics also without much aesthetic quality.

Even if an approximately 7- to 8-story, 76-foot-high parking structure were visible from certain viewpoints, visibility alone would not be considered an adverse impact because the new building would present a similar cityscape from these vantage points and would be compatible with the views of the surrounding structures. Therefore, development of the Vignes Lot Parking Structure would not degrade the visual quality of the Project Area, and impacts would be less than significant.

- **Impact 5.1-3:** The Proposed Project would not result in significant shade/shadow impacts (Threshold AE-4).

The Proposed Project would construct two towers up to 400 feet high. Using the location of the towers on the preliminary site plan, two 400-foot towers were modeled to evaluate the potential shade impacts. Based on Figures 5.1-7 through 5.1-10 that illustrated movement of shadows from 7 AM to 6PM during summer solstice and 8AM to 4 PM during winter solstice, no outdoor locations would be shaded for more than three hours at any time of the day. Therefore, shadow impacts were determined to be less than significant. Moreover, no readily identifiable routinely useable outdoor areas are located near the SSPS Site and the Vignes Lot, and no single sensitive outdoor use location would be adversely impacted by shadows for more than three hours at any time of the day. Impacts would be less than significant.

- **Impact 5.1-4:** The Proposed Project would not result in substantial light and glare impacts (Threshold AE-4).

The Proposed Project would not include uses or lighting sources such as flashing lights or electronic billboards that would create excess offsite lighting or glare spillover at offsite uses. The Proposed Project would also be required to comply with the California Green Building Standards Code and Building Energy Efficiency Standards, which outline mandatory provisions for lighting control devices and luminaires. The Project's certification with the U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED) gold rating or equivalent would also provide more opportunities to use natural lighting compared to the existing MCJ facility. Although nighttime lighting and glare from the Project Site would be visible from surrounding areas, the light sources of the Proposed Project would be similar to those of existing onsite uses and surrounding land uses, and adverse nighttime lighting and glare impacts would not occur. Impacts would be less than significant.

There are project design feature and regulatory requirement that would reduce the Project's potential aesthetic impacts, as listed below.

- PDF AE-1 The County will prepare a Lighting Plan that depicts the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project Site. The Lighting Plan will ensure that lighting levels meet the security requirements for the Consolidated Correctional Treatment Facility (CCTF). The Lighting Plan will be provided to the County Director of Public Works (DPW) to confirm its findings prior to the commencement of any on-site or off-site demolition/construction activities. Upon approval of the Lighting Plan by DPW, the Project shall be implemented in compliance with the Lighting Plan.

RR AE-1 The County shall coordinate with the City of Los Angeles and City of Los Angeles Department of Transportation regarding proposed off-site improvements within the City's public right-of-way as they relate to street improvement plans, and streetscape design for sidewalks and parkways.

3.2.2 Air Quality

Finding. The Proposed Project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.2-5:** The Proposed Project would not expose sensitive receptors to substantial pollutant concentrations during project operations. (Threshold AQ-4)

Operation of the Proposed Project under both options would not generate substantial quantities of emission from onsite, stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD include industrial land uses, such as chemical processing and warehousing operations where substantial truck idling could occur onsite. The Proposed Project does not fall within these categories of uses. Based on the average daily trips (ADT) generated by the Proposed Project, a significant CO hotspot impact would not occur.

- **Impact 5.2-6:** The Proposed Project would not create objectionable odors. (Threshold AQ-5)

The Proposed Project is required to comply with the South Coast Air Quality Management District (SCAQMD) Rule 402, Nuisance, which would minimize any potential odor impacts.

There are regulatory requirements that would reduce the Project's potential air quality impacts, as listed below:

RR AIR-1 (same as RR GHG-1) New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). The 2016 Building and Energy Efficiency Standards are effective starting on January 1, 2017. The Building Energy and Efficiency Standards and CALGreen are updated tri-annually with a goal to achieve net zero energy (NZE) for residential buildings by 2020 and non-residential buildings by 2030. The County's green building standards which implement and exceed CALGreen are identified County Code, Title 31. The County has adopted the Voluntary Tier 1 standards for non-residential construction greater than or equal to 25,000 square feet (CALGreen Section 301.3.1, "Buildings greater than or equal to 25,000 square feet").¹

¹ With the exception that high-rise non-residential construction would be subject to the mandatory (Table A4.106.5.1(3)), rather than the Tier 1 voluntary, measures for solar reflectance in Table A5.106.11.2.2.

- RR AIR-2 (same as RR GHG-2) New buildings are required to adhere to the California Green Building Standards Code (CALGreen) requirement to provide bicycle parking for new non-residential buildings, or meet local bicycle parking ordinances, whichever is stricter (CALGreen Sections 5.106.4.1, 14.106.4.1, and 5.106.4.1.2). The Proposed Project would be required to provide anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added. For employees, long-term secured bicycle parking is required to be provided for 5 percent of the tenant-occupied (i.e., staff) motorized vehicle parking spaces being added. The Proposed Project is also required to designate parking for low-emitting, fuel-efficient, and carpool/vanpool spaces identified in CALGreen. As the County's Green Building Ordinance requires compliance with the Tier 1 voluntary measures in section A5.601.2.4, the Proposed Project will be required to provide low-emitting, fuel-efficient, and carpool/vanpool spaces for 10 percent of the total parking capacity.
- RR AIR-3 (same as RR GHG-3) The Proposed Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at the CCTF to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance.
- RR AIR-4 (same as RR GHG-6) Shuttle bus and vendor vehicle use will be conducted in compliance with 13 California Code of Regulations (CCR) Section 2485, which requires that non-essential idling for all diesel-fueled commercial motor vehicles must not exceed 5 consecutive minutes at any location.
- RR AIR-5 (same as RR GHG-7) Construction activities will be conducted in compliance with 13 California Code of Regulations (CCR) Section 2499, which requires that nonessential idling of construction equipment is restricted to five minutes or less..
- RR AIR-6 Construction activities will be conducted in compliance with any applicable South Coast Air Quality Management District (SCAQMD) rules and regulations, including but not limited to the following:
- Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance.
 - Rule 402, Nuisance, which states that a Project shall not “discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property”.
 - Rule 1113, which limits the volatile organic compound content of architectural coatings.

- Rules 201, 203 and 219, which regulate permits for installation and use of equipment that may generate air contaminants, such of commercial kitchen equipment and emergency generators.

RR AIR-7 Construction activities must comply with the standard County specifications for best management practices (BMPs) for construction activities. These BMPs may include, but are not limited to:

- Eroded sediments and other pollutants must be retained on-site and may not be transported from the site via sheetflow, swales, area drains, natural drainage courses or wind.
- Stockpiles of earth and other construction related materials must be protected from being transported from the site by the forces of wind or water.
- Fuels, oils, solvents and other toxic materials must be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system.
- Excess or waste concrete may not be washed into the public way or any other drainage system. Provisions shall be made to retain concrete waste on-sites until they can be disposed of as solid waste.
- Trash and construction related solid wastes must be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind.
- Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means.
- Any slopes with disturbed soils or denuded of vegetation must be stabilized so as to inhibit erosion by wind and water.

RR AIR-8 (same as RR GHG-8) The County’s Energy and Environmental Policy was adopted in 2016 requiring County buildings to achieve a minimum of U.S. Green Building Council’s Leadership in Energy Efficiency and Design (LEED) “Gold” certification, exceeding the Executive Order B-18-12 for state buildings larger than 10,000 square feet to achieve the LEED “Silver” certification.

3.2.3 Biological Resources

Finding. The Proposed Project would have no or less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.3-1:** Development of the Proposed Project would not impact any special status plant and animal species. (Threshold B-1)

The Project Site, SSPS, Vignes Lot and the adjoining parcels of those properties are fully developed. There are no candidate, sensitive, or special status species on any of the impacted properties, and none would be impacted by the Proposed Project.

- **Impact 5.3-2:** Implementation of the Proposed Project would not cause the loss of sensitive habitats, riparian habitats, or any protected wetlands. (Thresholds B2- and B-3)

There are no sensitive habitats, riparian habitats, or wetlands as defined by Section 404 of the Clean Water Act (CWA) on the Project Site, SSPS, or the Vignes Lot. Although the Project Site is approximately 0.1 mile from the Los Angeles River, the Los Angeles River is a concrete channelized river, and no associated habitat would be lost due to project implementation. Therefore, Proposed Project would not result in impacts to riparian habitat or other sensitive natural communities identified in local, regional, or national plans, including the County's Los Angeles River Master Plan.

- **Impact 5.3-3:** The Proposed Project would not interfere substantially with overland wildlife movement, impede the use of native wildlife nursery sites, or adversely affect migratory birds. (Threshold B-4)

The Project Site is developed in an urbanized area bounded by Interstate 110 to the west, Interstate 101 to the south, and Interstate 5 the east. The SSPS Site and the Vignes Lot have also been heavily disturbed with urban uses and do not contain any sensitive natural communities to support wildlife movement. The Proposed Project would remove all of the ornamental shrubs and trees on the Project Site and could also affect street trees. The mature trees on and near the Project Site could be used for nesting by migratory birds protected under the federal Migratory Bird Treaty Act (MBTA) (US Code, Title 16, §§ 703–712). The MBTA prohibits direct impacts to nesting birds and their nests. Also, the California Fish and Game Code (§ 3503.5) prohibits activities that take, possess, or destroy the nest or eggs of any such bird. The County is required to comply with the MBTA.

- **Impact 5.3-4:** Implementation of the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, or any habitat conservation plan or natural communities conservation plan. (Thresholds B-5 and B-6)

There are no local policies or ordinances protecting other biological resources found at the Project Site. The Project Site is not in the plan area of a habitat conservation plan or Natural Communities Conservation Plan (CDFW 2014; USFWS 2014). There are no Significant Ecological Areas designated by the County on or near the Project Site.

The SSPS Site is developed as surface parking, and it is 100 percent impervious, without any landscaping or other biological resources. The SSPS Site and its resources are not covered under any local policies or ordinances protecting biological resources, or any habitat conservation plan

or natural communities conservation plan. Project implementation would not conflict with any local policies or ordinances protecting biological resources or any habitat conservation plan, and no impact would occur.

There is a regulatory requirement that would reduce the Project's potential biological resources impacts, as listed below.

RR BIO-1 The Proposed Project shall be implemented in compliance with the conditions set forth in the Migratory Bird Treaty Act and California Fish and Game Code with methods accepted by the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife to protect active bird/raptor nests. To the extent feasible, vegetation/tree removal shall occur during the nonbreeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Proposed Project requires that work be initiated during the breeding season for nesting birds and raptors (January 15 to September 1), a preconstruction survey for nesting birds and raptors shall be conducted by a qualified biologist (i.e., one with experience conducting nesting bird surveys) within 7 days prior to clearing of any vegetation and/or any work near existing structures (i.e., within 300 feet for nesting birds and within 500 feet for nesting raptors). If the biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed. A letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.

If the biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified biologist: (1) clearing limits shall be established within a buffer around any occupied nest (the buffer shall be 25 to 300 feet for nesting birds and 300 to 500 feet for nesting raptors), unless otherwise determined by a qualified biologist and (2) access to the nesting area and surveying activities related to construction shall be restricted within the buffer of any occupied nest unless otherwise determined by a qualified biologist. Encroachment into the buffer area around a known nest shall only be allowed if the biologist determines that the proposed activity would not disturb the nest occupants. Flagging, stakes, and/or construction fencing shall be used to demarcate the buffer around the nest, and construction personnel shall be instructed as to the sensitivity of the area. Construction will be allowed to proceed when the qualified biologist has determined that fledglings have left the nest or the nest has failed.

3.2.4 Cultural Resources

Finding. The Proposed Project would have less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.4-1:** The Proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.

Based on the Cultural Resources Assessment prepared for the MCJ facility, development of CCTF would not result in a substantial adverse impact to historical resources. The SSPS Site and the Vignes Lot also do not contain development that meets the CEQA Guidelines Section 15064.5. Impacts would be less than significant.

- **Impact 5.4-4:** The Proposed Project would not disturb human remains, including those interred outside of formal cemeteries. (Threshold C-4)

Compliance with California Health and Safety Code Section 7050.5 would ensure that impacts to human remains are minimized to a less than significant level. With implementation of RR CUL-1, Impact 5.4-4 was determined to be less than significant, and no finding is necessary.

There is a regulatory requirement that would reduce the Proposed Project's potential cultural resources impacts, as listed below:

- RR CUL-1 All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County Coroner has been contacted. If applicable, the Native American Heritage Commission will be responsible for designating the most likely descendant (MLD), as required by Section 5097.98 of the California Public Resources Code. If the landowner rejects the recommendations of the MLD, the burial location would be determined in compliance with California Public Resources Code, Section 5097.98.

3.2.5 Geology and Soils

Finding. The Proposed Project would have no or less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.5-1:** The Proposed Project would not expose people or structures to adverse seismic-related hazards including surface rupture and ground shaking. (Thresholds G-1.i, G-1.ii, and G-1.iv)

The Project Site, SSPS Site, and the Vignes Lot are not in the currently designated Alquist-Priolo Special Studies Zones for surface fault rupture, and not underlain by a known surface faults. Therefore, the Proposed Project would not be exposed to surface rupture hazards.

Seismic design criteria and requirements in the California Building Code (CBC) would allow structures and infrastructure to withstand seismic ground shaking and reduce hazards to persons and property. The CBC also requires that the recommendations of the geotechnical report, prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist), be incorporated into the design and construction of the Project. Compliance with RR GEO-1 would ensure that the Proposed Project would not expose people or structures to potential substantial adverse effects from ground shaking hazards.

- **Impact 5.5-2:** The Proposed Project would not expose people or structures to substantial hazards from unstable geologic units or soil. (Threshold G-1iii and G-3)

As required by RR GEO-1, prior to the completion of final engineering design plans, the Proposed Project's design and construction must give consideration to the effects of potential subsidence and collapsible soils. This could include remedial grading in specific areas to prepare the site to support the proposed structures; to provide a relative uniform-bearing material below shallow foundations; and/or to allow for over-excavation and recompaction below planned foundations. Compliance with RR GEO-1 would ensure that the potential for impacts from unstable geologic units or soils (e.g., liquefaction, subsidence, collapsible soils, and lateral spreading) would be less than significant.

- **Impact 5.5-3:** Project construction would not cause substantial soil erosion. (Threshold G-2)

The County is required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) that specifies best management practices (BMPs) for temporary erosion controls (RR HYD-1). Such measures typically include temporary catchment basins and/or sandbagging to control runoff and contain sediment transport within the Project Site. Therefore, implementation of RR HYD-1 would prevent construction activities from resulting in significant adverse impacts associated with substantial soil erosion and/or loss of topsoil.

- **Impact 5.5-4:** The Proposed Project would not be located on expansive soils creating substantial risks to life or property. (Threshold G-4)

As required by RR GEO-1, prior to the completion of final engineering design plans, the CCTF, SSPS, and the Vignes Lot parking structures' design and construction must give consideration of the effects of expansive soils. Less than significant impacts related to expansive soils would occur.

- **Impact 5.5-5:** The Proposed Project would not require the use of septic tanks. (Threshold G-5)

The Proposed Project would include upgrades to existing sewer laterals and sewer mains, and the Proposed Project would not use septic tanks or other alternative wastewater disposal systems. No impact would occur.

There are regulatory requirements that would reduce the Proposed Project's potential geology and soils impacts, as listed below:

- RR GEO-1 The Project will be designed and constructed in accordance with the Los Angeles County Building Code, which adopts the California Building Code (CBC), which is based on the International Building Code (IBC). New construction, alteration, or rehabilitation shall comply with applicable ordinances set forth by the County and/or by the most recent County building and seismic codes in effect at the time of Project design. In accordance with Section 1803.2 of the 2013 CBC, a geotechnical investigation is required that must evaluate soil classification, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness, as necessary, determined by the County Building Official. The geotechnical investigation must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the Project.

3.2.6 Greenhouse Gas Emissions

Finding. The Proposed Project would have less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.6-1:** The Proposed Project would not generate GHG emissions that may have a significant impact on the environment. (Threshold GHG-1)

The Proposed Project at buildout under Option 1 would generate a net decrease in GHG emissions of 13,134 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year, and under Option 2, the net decrease would be 13,352 MTCO_{2e} per year. Thus, the total GHG emissions generated from the Proposed Project under both options would not exceed SCAQMD's screening threshold of 3,000 MTCO_{2e}, which is applicable for all land use types. Therefore, impacts would be less than significant.

- **Impact 5.6-2:** The Proposed Project would be consistent with plans adopted to reduce GHG emissions. (Threshold GHG-2)

The Proposed Project is required to adhere to the programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32. The Proposed Project would be constructed to achieve the LEED Gold

certification and would result in a beneficial impacts related to GHG emissions. Therefore, the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

There are regulatory requirements that would reduce the Proposed Project's potential greenhouse gas emissions impacts, as listed below:

- RR GHG-1 (same as RR AIR-1) New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). The 2016 Building and Energy Efficiency Standards are effective starting on January 1, 2017. The Building Energy and Efficiency Standards and CALGreen are updated tri-annually with a goal to achieve net zero energy for residential buildings by 2020 and non-residential buildings by 2030. The County's green building standards which implement and exceed CALGreen are identified County Code, Title 31. The County has adopted the Voluntary Tier^o1 standards for non-residential construction greater than or equal to 25,000 square feet (CALGreen Section 301.3.1, Buildings greater than or equal to 25,000 square feet).²
- RR GHG-2 (same as RR AIR-2) New buildings are required to adhere to the California Green Building Standards Code (CALGreen) requirement to provide bicycle parking for new non-residential buildings, or meet local bicycle parking ordinances, whichever is stricter (CALGreen Sections 5.106.4.1, 14.106.4.1, and 5.106.4.1.2). The Proposed Project would be required to provide anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for five percent of new visitor motorized vehicle parking spaces being added. For employee, long-term secured bicycle parking is required to be provided for five percent of the tenant-occupied (i.e., staff) motorized vehicle parking spaces being added. The Proposed Project is also required to designate parking for low-emitting, fuel-efficient, and carpool/vanpool spaces identified in CALGreen. As the County's Green Building Ordinance requires compliance with the Tier^o1 voluntary measures in section A5.601.2.4, the Proposed Project will be required to provide low-emitting, fuel-efficient, and carpool/vanpool spaces for 10 percent of the total parking capacity.
- RR GHG-3 (same as RR AIR-3) The Proposed Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at the CCTF to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance.
- RR GHG-4 New buildings are required to adhere to the California Green Building Standards Code (CALGreen) and Water Efficient Landscape Ordinance (WELO) requirements integrated into the County Code to increase water efficiency and reduce urban per capita water demand. The County's green building standards are identified County

² With the exception that high-rise non-residential construction would be subject to the mandatory (Table A4.106.5.1(3)), rather than the Tier 1 voluntary, measures for solar reflectance in Table A5.106.11.2.2.

Code, Title 31. The Proposed Project will comply with Section 301.3.1, Nonresidential Buildings greater than or equal to 25,000 square feet, which requires implementation of the Tier¹ voluntary standards (30 percent reduction) for indoor potable water use and 60 percent of Reference evapotranspiration (ET_o) for outdoor potable water use; Section 5.106.4, Low Impact Development; and Section 4.106.5, Landscape Design, which requires use of non-invasive drought tolerant plants. Title 31 requires project designs and practices that will result in the conservation of water and energy resources, such as measures for building commissioning, clean vehicle parking, and solid waste recycling.

- RR GHG-5 Construction contractors within Los Angeles County are required to adhere to the County's Construction & Demolition (C&D) Debris Recycling and Reuse Ordinance, Chapter 20.87 of the County Code. The County's C&D requirements are consistent with CALGreen requirements and require construction contractors to divert a minimum of 50 percent of the construction generated waste from area landfills, depending on the type and intensity of construction. For the Proposed Project, construction contractors would be required to divert a minimum of 65 percent of the C&D debris by weight and submit a Recycling and Reuse Plan to the County's Construction & Demolition Unit for review and approval. Additionally, according to the County's Green Building Ordinance, which requires implementation of CALGreen Tier¹ voluntary standards, the Proposed Project building materials will include a minimum of 10 percent of recycled content based on estimated cost.
- RR GHG-6 (same as RR AIR-4) Shuttle bus and vendor vehicle use will be conducted in compliance with 13 California Code of Regulations (CCR) Section 2485, which requires that non-essential idling for all diesel-fueled commercial motor vehicles must not exceed 5 consecutive minutes at any location.
- RR GHG-7 (same as RR AIR-5) Construction activities will be conducted in compliance with 13 California Code of Regulations (CCR) Section 2499, which requires that nonessential idling of construction equipment is restricted to five minutes or less.
- RR GHG-8 (same as RR AIR-8) The County's Energy and Environmental Policy was adopted in 2016 requiring County buildings to achieve a minimum of U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED) "Gold" certification, exceeding the Executive Order B-18-12 for state buildings larger than 10,000 square feet to achieve the LEED "Silver" certification.

3.2.7 Hazards and Hazardous Materials

Finding. The Proposed Project would have no or less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.7.1:** The Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Threshold H-1)

Demolition and construction activities would require transport, use, and disposal of hazardous materials. However, the County is required to comply with existing regulations to during construction and operation to ensure that impacts are reduced to a less than significant level. The required implementation of PDF HAZ-1 through PDF HAZ-5 and RR HAZ-1 through RR HAZ-5 would adequately control and handle hazardous materials during construction and operation so that release and exposure do not result in significant safety impacts to the environment.

- **Impact 5.7-3:** Project construction and operations would handle hazardous materials and emit hazardous emissions within 0.25 miles of one school. (Threshold H-3)

Health risk is based upon the conservative assumption that exposure is continuous and occurs over a 70-year lifetime. Therefore, determination of risk is not appropriate for short-term construction activities. Exposure to diesel exhaust during the construction period would not pose substantial hazards to persons at any of the schools within 0.25 mile of the construction sites. Moreover, as with the existing MCJ operation, compliance with the applicable programs would ensure that the increased handling of hazardous materials would not create substantial hazards for the school population.

- **Impact 5.7-5:** There are no public-use airports near the Project Site, and Project development would not cause airport-related hazards for people on the Project Site, SSPS Site, and the Vignes Lot. (Threshold H-5)

The nearest public-use airport from the Project Site, the SSPS Site, and the Vignes Lot, is San Gabriel Valley Airport, about 11 to 11.5 miles to the east. The Proposed Project would not be impacted by any Airport Land Use Plan, and no airport safety hazards would occur.

- **Impact 5.7-6:** Construction of proposed towers up to 400 feet high could constrain approach and departure paths into LASD's helistops on top of the 10-story parking structure next to the Project Site. Project development would not pose hazards for people on the Project area related to other nearby helistops. (Threshold H-6)

Although the actual locations or heights of structures are unknown at this time, the new CCTF structures would be designed and situated so that the structures comply with applicable FAA and Caltrans regulations concerning helistops and aircraft operations. Therefore, implementation of the existing regulations such as RR HAZ-8 would ensure that impacts would be less than significant.

- **Impact 5.7-7:** The Proposed Project would not interfere with the implementation of an emergency response or evacuation plan. (Threshold H-7)

The Proposed Project does not involve operation that could potentially interfere with implementation or coordination of applicable disaster preparedness plans. Development of the

Proposed Project would not substantially modify the existing access points to adversely affect the existing emergency response plan. Moreover, adequate improvements would be made in compliance with Los Angeles County Fire Department (LACFD) standards for roadway improvements and emergency access. LACFD would review Project site plans for access and safety issues. During construction, adequate staging area would be provided within the project boundaries, minimizing blocking public roadways in a way to interfere with emergency access.

- **Impact 5.7-8:** Project development would not expose Project occupants, workers, or visitors to wildland fire hazards. (Threshold H-8)

There is no wildland vegetation on or near the Project Site, SSPS Site, and the Vignes Lot, and the nearest Very High Fire Hazard Severity Zone mapped by the California Department of Forestry and Fire Prevention is about 0.5 mile to the north (CAL FIRE 2011). The Proposed Project would not expose CCTF or any of the parking structure option to wildland fire hazards.

There are project design features and regulatory requirements that would reduce the Proposed Project's potential hazards and hazardous materials impacts, as listed below:

- PDF HAZ-1 All removal and disturbance of asbestos containing material (ACM) and subsequent waste disposal will be performed by an asbestos abatement contractor using 40-hour asbestos trained workers (Asbestos Worker trained as outlined in 40 CFR 763). Abatement contractor's workforce will be supervised by experienced trained workers knowledgeable and qualified in the techniques of asbestos abatement, asbestos handling, disposal of asbestos-containing and/or asbestos-contaminated materials, and the subsequent cleaning of contaminated areas, including, at a minimum, Competent Person/Contractor Supervisor training outlined in 40 CFR 763.
- PDF HAZ-2 All removal and disposal of lead-based paints (LBPs) and coatings and subsequent waste disposal will be performed by a state-licensed contractor, using California Department of Public Health (CDPH)-certified workers with at least one CDPH-certified Supervisor. Abatement contractor's workforce will be supervised by experienced trained workers knowledgeable and qualified in the techniques of lead abatement and handling, disposal of lead-containing and/or lead-contaminated materials, and the subsequent cleaning of contaminated areas.
- PDF HAZ-3 When exposure monitoring of a particular lead-related task indicates that the permissible exposure level is or will be exceeded, the contractor shall use California Department of Public Health (CDPH)-certified lead workers to complete the task.
- PDF HAZ-4 The removal of other hazardous materials, such as polychlorinated biphenyls (PCBs), mercury-containing light ballast, and mold, will be completed by workers with hazardous waste operations and emergency response standard (HAZWOPER) training, as outlined in 29 CFR 1910.120 and 8 CCR 5192.
- PDF HAZ-5 Construction contractor will furnish all labor; materials; services; insurance specifically covering the handling and transportation of asbestos-containing materials (ACMs), lead-based paint (LBP), polychlorinated biphenyls (PCBs), and mercury-

containing light ballast; and equipment that is specified, shown, or reasonably implied for the removal, transport, and disposal of the identified hazardous materials.

- RR HAZ-1 Any Project-related hazardous materials and hazardous wastes will be transported to and/or from the Project Site in compliance with any applicable state and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; and the California Occupational Safety and Health Administration standards.
- RR HAZ-2 Any Project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations, Title 40, Part 263), including the management of non-hazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The Project will be designed and constructed in accordance with the regulations of the Los Angeles County Fire Department, which serves as the designated Certified Unified Program Agency (CUPA) and which implements State and federal regulations for the following programs: (1) Hazardous Waste Generator Program, (2) Hazardous Materials Release Response Plans and Inventory Program, (3) California Accidental Release Prevention (CalARP), (4) Above Storage Tank (AST) Program, and (5) Underground Storage Tank (UST) Program.
- RR HAZ-3 Any Project-related underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the Regional Water Quality Control Board, Department of Toxic Substances Control, Los Angeles County Fire Department, South Coast Air Quality Management District and/or other regulatory agencies, as necessary. Any Project-related use of existing USTs will also have to be conducted (i.e., used, maintained and monitored) in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations).
- RR HAZ-4 Any Project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to:
- South Coast Air Quality Management District's Rule 1403
 - California Health and Safety Code (Section 39650 et seq.)
 - California Code of Regulations (Title 8, Section 1529)
 - California Occupational Safety and Health Administration regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead])

- Code of Federal Regulations (Title 40, Part 61 [asbestos], Title 40, Part 763 [asbestos], and Title 29, Part 1926 [asbestos and lead])

RR HAZ-5 The removal of other hazardous materials, such as polychlorinated biphenyls (PCBs), mercury-containing light ballast, and mold, will be completed in accordance with applicable regulations pursuant to 40 CFR 761 (PCBs), 40 CFR 273 (mercury-containing light ballast), and 29 CFR 1926 (molds) by workers with the hazardous waste operations and emergency response (HAZWOPER) training, as outlined in 29 CFR 1910.120 and 8 CCR 5192.

RR HAZ-6 Any Project-related new construction, excavations, and/or new utility lines within 10 feet or crossing existing high-pressure pipelines, natural gas/petroleum pipelines, or electrical lines greater than 60,000 volts will be designed and constructed in accordance with the California Code of Regulations (Title 8, Section 1541).

RR HAZ-7 Any Project-related medical waste will be stored, transported, and disposed of in accordance with the Medical Waste Management Act (California HSC §§ 117600–118360) and pursuant to regulations by the California Department of Public Health.

RR HAZ-8 The Project will be designed and constructed in accordance with Part 77 of the Federal Aviation Regulations (FAR), which requires the County of Los Angeles to notify the Federal Aviation Administration of proposed construction or alteration within 5,000 feet of a heliport where the structure would extend into a slope of a 25:1 from the nearest landing and take-off area of the heliport (FAR §§77.9).

The Project helistop(s) will be designed in accordance with FAR §§77.23 that provides imaginary surface criteria for heliports for safe operation of helicopters. The approach imaginary surface for a heliport will extend at a 8:1 slope upward from the heliport’s primary surface (i.e., the designated take-off and landing area) for a distance of 4,000 feet, and the heliport’s transitional surface will extend from the lateral boundary of both the primary surface and approach surface at a 2:1 slope for a distance of 250 feet.

3.2.8 Hydrology and Water Quality

Finding. The Proposed Project would have no or less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.8-1:** The Proposed Project would not violate water quality standards or waste discharge requirements, otherwise degrade water quality, or have a significant impact on water quality due to site discharges. (Thresholds HYD 1 and HYD 6)

To minimize these potential impacts, the Proposed Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP)

as well as prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction (i.e., RR HYD-1). With the implementation of the SWPPP and BMPs pursuant to RR HYD-1, the impact to water quality during construction activities would be less than significant.

As stated in RR HYD-2, the Proposed Project would be constructed and operated in accordance with the County MS4 Permit requirements. Under this permit, the Project applicant is required to submit a low impact development (LID) Plan for review and approval by the Director of Public Works that provides details on how the Proposed Project would comply with the requirements of the MS4 Permit, LID ordinance, and LID manual. In addition, the Proposed Project would be required to meet LEED Gold level certification or equivalent standard for sustainability, which requires adherence to the Sustainable Sites 6.1 and 6.2 provisions (Stormwater Design Quantity Control and Stormwater Design Quality Control). Therefore, compliance with the existing regulations, including preparation and implementation of the LID Plan, would ensure that stormwater pollutants would be adequately treated, and impacts to water quality from operation of the Proposed Project would be less than significant.

- **Impact 5.8-2:** The Proposed Project would not substantially deplete groundwater supplies, interfere substantially with groundwater recharge, or result in a significant impact to groundwater quality. (HYD-2)

Soil borings conducted on the Project Site and adjacent properties indicate groundwater depths between 31 and 36 feet below ground surface (bgs). Therefore, groundwater is not likely to be encountered during construction activities, and there would be no impact on groundwater supplies or groundwater recharge from these activities. Construction activities are temporary in nature and would not result in a substantial depletion of groundwater supplies that could result in a lowering of the groundwater table.

As the existing Project Site is approximately 99 percent impervious and the Proposed Project would have a similar or lower impervious percentage, there would be no net change or possibly a slight increase in groundwater recharge conditions at the Project Site.

- **Impact 5.8-3:** Development of the Proposed Project would not substantially alter the existing drainage pattern to result in potentially significant erosion or siltation impacts. (Threshold HYD-3)

The County is required to implement the SWPPP prior to the commencement of construction activities to the State Water Resources Control Board (SWRCB) to ensure that erosion or siltation impacts are reduced during construction. With implementation of the BMPs contained in the SWPPP and compliance with state and County regulatory requirements, the potential for impacts resulting in erosion and siltation would be less than significant.

The Proposed Project would not alter the course of a stream or river and would not significantly alter existing drainage patterns. The incorporation of treatment control BMPs, such as catch basin inserts and bioswales, and infiltration BMPs, such as retention areas/rain gardens, would reduce stormwater runoff rates and minimize the potential for erosion or siltation impacts.

Implementation of PDFs HYD-1 through HYD-4 and RR HYD-2 would prevent erosion and siltation from long-term operational activities.

- **Impact 5.8-4:** Development of the Proposed Project would not substantially alter the existing drainage pattern to result in adverse flooding impacts, create or contribute runoff water that would exceed the capacity of existing or planned stormwater systems, or provide substantial additional sources of polluted runoff. (Thresholds HYD-4 and HYD-5)

The Project Site is approximately 99 percent impervious and the amount of impervious surface would remain similar with the proposed redevelopment. The preliminary hydrology calculations show that peak flow rates from the Project Site from the both the 50-year and 25-year storm events would be slightly lower after implementation of the Proposed Project than under existing conditions with the implementation of LID measures. Results from the County LID calculations also indicate that the required treatment/infiltration volumes at the Project Site would be 56,839 cubic feet or approximately 1.3 af. Therefore, the Proposed Project would not significantly alter existing drainage patterns at the site or increase the rate or volume of runoff in a manner that would result in flooding on- or off-site. The Proposed Project would also not create the need for improvements to the existing storm drain system because the stormwater peak flow rates would decrease with implementation of RR HYD-1 and RR HYD-2. Therefore, impacts related to the alteration of drainage patterns, the potential for flooding, and potential for polluted runoff would be less than significant.

- **Impact 5.8-5:** Project development would not place housing or structures that would redirect flood flows into a 100-year flood zone. (Thresholds HYD-7 and HYD-8)

The Project Site is within Federal Emergency Management Agency (FEMA) Flood Hazard Zone X, which means that it is outside both the 100-year and 500-year floodplains. Therefore, no housing or structures would be placed within a 100-year flood hazard area, and there would be no impact associated with this significance standard.

- **Impact 5.8-6:** The Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, as a result of the failure of a dam. (Threshold HYD-9)

The Project Site and the Vignes Lot are within the inundation area for the failure of Hansen Dam. Considering the length of time required for released water to reach the Project Site (13 hours), the low probability of dam failure, and the generally low level of water behind the Hansen Dam, implementation of the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death in the case of dam failure. The SSPS Site is outside of the Hansen Dam inundation area. Impacts are considered less than significant.

- **Impact 5.8-7:** The Proposed Project would not be subject to inundation by seiche, tsunami, or mudflow. (Threshold HYD-10)

The Project Site, SSPS Site, and the Vignes Lot are not near any aboveground storage tanks or open water bodies that could pose a hazard due to seiches, and considering area topography, the Proposed Project would not be subject to mudflows or debris flows. Due to its distance from the ocean and its elevation above sea level, all three properties would not be subject to inundation due to a tsunami.

There are project design features and regulatory requirements that would reduce the Proposed Project's potential hydrology and water quality impacts, as listed below:

- PDF HYD-1 The Project's specifications will require that the Proposed Project be designed and constructed for the incorporation of source-control, site-design, and treatment-control BMPs to reduce pollutants in the stormwater and to minimize stormwater runoff rates and volumes in accordance with the following guidance of the Los Angeles County Department of Public Works:
- 2014 Low Impact Development Standard Manual
 - 2013 California Green Building Standards Code
 - 2006 Hydrology Manual
- PDF HYD-2 The Project specifications will require that the Proposed Project be designed and constructed in accordance with the County's Stormwater and Runoff Pollution Control Ordinance (Chapter 12.80 of the County Code), which prohibits illicit discharges; manages runoff into and from its Municipal Separate Sewer Systems (MS4s) and requires BMPs for new development and major redevelopment projects.
- RR HYD-1 The Project will be constructed in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities, Order No 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ and 2012-0006-DWQ. Compliance requires filing a Notice of Intent (NOI); a Risk Assessment; a Site Map; a Storm Water Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs); an annual fee; and a signed certification statement. Also, Los Angeles County requires preparation of an erosion and sediment control plan (ESCP) for projects that disturb more than one acre of land and implementation of BMPs to control erosion, debris, and construction-related pollutants.
- RR HYD-2 The Project will be constructed and operated in accordance with the Los Angeles County MS4 Permit (Order No. R4-2012-0175), as amended by Order WQ 2015-0075. The MS4 Permit requires new development and redevelopment projects to retain on-site a specified volume of stormwater runoff from a design storm event. The LID Standards Manual provides the guidance on how new development and redevelopment projects can meet these on-site retention requirements through the use of stormwater quality control measures.

3.2.9 Land Use and Planning

Finding. The Proposed Project would have no or less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.9-1:** Project implementation would not physically divide an established community. (Threshold LU-1)

The Proposed Project involves replacement of MCJ with the CCTF within the same boundaries. The SSPS Site is already operating as a surface parking lot for the County and the Vignes Lot is vacant surrounded by various industrial, manufacturing, and distribution uses. The proposed development would not physically divide an established community and would not affect the land uses in the Project Vicinity.

- **Impact 5.9-2:** The Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the County General Plan, the Central City North Community Plan, or SCAG regional plans) adopted for the purpose of avoiding or mitigating an environmental effect. (Threshold LU-2)

The Project Site currently operates as the County MCJ, and the Proposed Project would improve the existing operations and provide better health care and mental health treatment to benefit both female and male inmate-patient population. The Project Site is designated Public Facilities by the City of Los Angeles General Plan. Although the Project Site is in the incorporated City of Los Angeles, as County-owned property, the Project Site is under the jurisdiction of the County, and the City's adopted land use provisions and policies are not applicable. As discussed Table 5.9-1, City of Los Angeles General Plan Consistency (Central City North Community Plan), Table 5.9-2, County General Plan Consistency, Table 5.9-3, Regional Comprehensive Plan Consistency, and Table 5.9-4, RTP/SCS Consistency, of the Draft EIR, implementation of the Proposed Project would not conflict with the City of Los Angeles General Plan, County of Los Angeles General Plan, Regional Comprehensive Plan, and the Regional Transportation Plan/Sustainable Communities Strategy.

- **Impact 5.9-3:** The Proposed Project would not conflict with any applicable habitat conservation plan or natural community conservation plan. (Threshold LU-3)

The Project Site, the SSPS Site, and the Vignes Lot are not within the plan area of any habitat conservation plan or natural community conservation plan, and the proposed development would not conflict with any such plan.

There are no applicable project design features or regulatory requirements related to land use and planning.

3.2.10 Noise

Finding. The Proposed Project would have less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.10-1:** Operation of the Proposed Project would not result in significant permanent increase in ambient noise levels in the Project vicinity, and the long-term operational impacts would not exceed applicable local standards. (Thresholds N-1 and N-3)

In comparison to existing traffic flows in the vicinity of the Project Site, the Proposed Project's contribution represents a worst-case increment in traffic-generated noise of less than 0.1 dB. This increase would be well below the threshold of audibility and well below the 3 dB threshold of significance. Through compliance with pertinent local noise regulations and due to high ambient noise levels at the Project Site, ambient noise levels in the vicinity of the Project Site would not exceed the County exterior noise standards.

- **Impact 5.10-3:** Construction activities would not result in significant temporary increases in ambient noise levels in the Project vicinity and would not generate construction noise levels in excess of local standards. (Thresholds N-1 and N-4)

Implementation of PDF NOI-1 would require construction vehicles and equipment to be equipped with properly operating and maintained mufflers. With adherence to the required construction noise regulations in County Code Section 12.12, which sets allowable hours of construction (RR-NOI-1), and given the dominance of traffic, rail, commercial, and industrial noise sources throughout the area around the Project Site, the impact from Project-related construction noise increases to temporary ambient noise levels would be less than significant.

- **Impact 5.10-4:** The proximity of the Project Site to helistop would not result in exposure of people residing or working in the Project area to excessive helistop-related noise. (Thresholds N-5 and N-6)

There are no public airports, public use airports, or private airstrip within two miles of the Project Site, SSPS Site, or the Vignes Lot. The closest airport is the San Gabriel Valley Airport, approximately 11 to 11.5 miles to the east from the affected properties.

There are project design features and regulatory requirements that would reduce the Proposed Project's potential noise impacts, as listed below:

- PDF NOI-1 The Project's specifications will require that the Proposed Project use construction vehicles and equipment, either fixed or mobile, that are equipped with properly operating and maintained mufflers (equivalent or better than original factory equipment), which will be periodically inspected to ensure compliance.

RR NOI-1 The Proposed Project will be designed and constructed in accordance with the Title 12 of the County Code, Sections 12.08, Noise Control and 12.12, Building Construction Noise. The County Code provides restrictions on the amount and duration of noise generated at a property, as measured at the property line of the noise receptor. It generally prohibits construction activities that generate noise that could create a disturbance across a residential or commercial property line from occurring between 7:00 PM and 7:00 AM on weekdays, or at any time on Sunday or a federal holiday.

3.2.11 Public Services

Finding. The Proposed Project would have no or less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.11-1:** The Proposed Project would not result in additional demands for fire protection facilities and personnel that would adversely impact the Los Angeles Fire Department’s ability to provide adequate service, or additional demands on other public services such as hospitals.

The required compliance with California Fire Code (CFC) Chapter 33, Fire Safety During Construction and Demolition, which has been incorporated into the County’s Fire Code (i.e., RR PS-1), would ensure that impacts to fire protection service are not significant. Moreover, the Proposed Project would not obstruct or impede travel times for the fire department/emergency medical services or result in traffic pattern changes to the area circulation system.

The Proposed Project would be designed to comply with the CFC to avoid structural fire hazards. The LACFD and State Fire Marshal (SFM) would review and approve all building plans and inspect for compliance with fire safety regulations prior to building completion.

- **Impact 5.11-2:** Project development would not increase demands for police protection in the City of Los Angeles Police Department’s service area. (Threshold PP-1)

Although the Project Site is in the City of Los Angeles Police Department’s (LAPD) service area, the police protection service within the Project Site is provided by LASD and it would continue to be protected by LASD.

- **Impact 5.11-3:** The Proposed Project would not generate new students who would impact the school enrollment capacities of area schools. (Threshold SS-1)

Impacts to local school facilities are created by growth-inducing projects such as residential development or nonresidential development that provides employment opportunities, which could indirectly result in population growth in the area. The Proposed Project would not result in population growth within the Los Angeles Unified School District (LAUSD) service area during construction and operation.

- **Impact 5.11-4:** The Proposed Project would not generate additional population that would increase the demand for local libraries. (Threshold LS-1)

The increase in staff for the CCTF would be accommodated from the local employment base in Los Angeles or nearby cities. No employees would need to be drawn from other areas, which could induce growth in the area. Therefore, no increased demand for library services would result from the Proposed Project.

There are regulatory requirements that would reduce the Proposed Project's potential public services impacts, as listed below:

PDF PS-1 The CCTF will be designed to incorporate better crime prevention through environmental design (CPTED) features and security technologies than the existing MCJ facility, thereby resulting in improved security for inmate-patients, staff, visitors, and the neighborhood. CPTED is a multi-disciplinary approach for deterring criminal behavior through environmental design. CPTED strategies rely upon the ability to influence offender decisions that precede criminal acts by affecting the built, social and administrative environment.

PDF PS-2 The Contractor's Specifications will require that the Proposed Project include space to accommodate general education classes, computer training, general and vocational career technical education, career counseling, a learning resource center, a library, and computer labs that will be made available to the inmate-patient population and provided through onsite classrooms, library facilities, and computer labs.

RR PS-1 The Proposed Project will be designed and constructed in accordance with the County of Los Angeles Fire Code (County Code, Title 32), which incorporates by adoption the California Fire Code, and the regulations of the Los Angeles County Fire Department, which include standards for building construction that would reduce the creation of fire hazards and facilitate emergency response.

RR PS-2 The Proposed Project will be designed, constructed, and operated in accordance with pertinent provisions of Title 15 of the California Code of Regulations (Crime Prevention and Corrections), including but not limited to Title 15, Division 1, Chapter 1, Subchapter 4, Minimum Standards for Local Detention Facilities; Title 24, Part 2, Section 1231, Minimum Standards for Adult Detention Facilities; and other applicable state and federal requirements.

3.2.12 Transportation/Traffic

Finding. The Proposed Project would have less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.12-3:** The Proposed Project would not conflict with the Los Angeles County Congestion Management Program. (Threshold T-2)

Based on the project trip distribution and trip generation, the project is expected to add fewer than 50 peak hour trips through the Alameda Street & Washington Boulevard CMP arterial monitoring station, the closest monitoring station from the Project Site. Impacts would be less than significant.

- **Impact 5.12-4:** Project development would not increase air traffic levels or require relocation of air traffic patterns. (Threshold T-3)

The nearest public-use airport to the Project Site, SSPS Site, and the Vignes Lot is the San Gabriel Valley Airport about 11 to 11.5 miles to the east. Implementation of the Proposed Project would affect this airport's operation. LASD operates numerous heliports in the Project Vicinity. However, their flight paths would be coordinated within the department so that operations of the helistops do not create safety hazards. Although the precise locations or heights have not been finally designed at this time, the new CCTF structures would be designed and situated so that the structures comply with applicable FAA and Caltrans regulations concerning heliports and aircraft operations pursuant to RR HAZ-8.

- **Impact 5.12-5:** Project circulation improvements would not substantially increase hazards due to design feature (e.g., sharp curves or dangerous intersections, etc.), potential conflicting uses, and emergency access. (Thresholds T 4 and T-5)

The Proposed Project would not change the alignment of the off-site circulation system. No sharp curves or dangerous intersections would be created during construction. Project development would not add incompatible uses to roadways near the Project Site. Depending on the final parking structure design, new curb cuts would be provided in compliance with the Los Angeles Department of Transportation (LADOT) standards. The Proposed Project would also provide adequate traffic control devices in accordance with the California Manual for Uniform Traffic Control Devices (MUTCD) as required by RR TRAN-1.

- **Impact 5.12-6:** The Proposed Project complies with adopted policies, plans, and programs for alternative transportation. (Threshold T-6)

There are no bus or other transit stops along the project boundaries and implementation of the Proposed Project would not directly interfere with operation of the Metro's and LADOT bus routes that operate near the Project Site. At Project completion, there would be sidewalks on the site frontage on Bauchet Street and North Vignes Street, as there are now. The Proposed Project would continue implement the existing menu of travel demand management (TDM) and also considering expanding the existing TDM through implement of PDF TRAN-1.

There are project design feature and regulatory requirements would reduce the Proposed Project's potential transportation/traffic impacts, as listed below:

- PDF TRAN-1 Before the opening of the Proposed Project, the County of Los Angeles will consider expanding the current menu of Transportation Demand Management (TDM) measures to reduce vehicle trips related to the Consolidated Correctional Treatment Facility (CCTF). In addition to the TDM measures currently in place, the following additional TDM measures will be reviewed for feasibility and implementation following completion of the CCTF.

- Direct financial awards for ridesharing
- Preferential parking for those who rideshare
- Parking pricing
- Parking cash-out
- Transit pass subsidy
- Vanpool program
- Review the existing pedestrian pathways between the Project Site and the Patsaouras Transit Plaza for ways to enhance their safety or convenience.
- If Option 1 is implemented, continue the temporary construction-period shuttle between the Project Site and the SSPS Site into the operational period, and alter the route to also connect it with the Patsaouras Transit Plaza.

RR TRAN-1 The Proposed Project's construction activities will be conducted in accordance with the provision of traffic-control devices in compliance with the California Manual for Uniform Traffic Control Devices (MUTCD) to ensure traffic safety on public streets, highways, pedestrian walkways, and bikeways.

3.2.13 Utilities and Service Systems

Finding. The Proposed Project would have less than significant direct, indirect, and cumulative impacts on the below listed thresholds of significance. Accordingly, no changes or alterations to the Proposed Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Final EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact 5.13-1:** Project-generated wastewater would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. (Threshold U-1)

No construction-related wastewater during demolition or building construction would be allowed to flow to the area sewage system. The potentially hazardous materials would not enter the local sewer system but would be treated and properly disposed of in accordance with appropriate local, state, and federal regulations (RR HAZ-1 and RR HAZ-2).

The Proposed Project is subject to the waste discharge requirements of the Coastal Watersheds of Los Angeles County MS4 Permit (Order No. R4-2012-0175) and NPDES Permit No. CAS004001 (RR HYD-2). The Proposed Project would not change the existing land use onsite; therefore, the nature and type of wastewater would not be adversely impacted. As discussed under Impact 5.13-2, the Proposed Project would not result in increased generation of wastewater, therefore, the volume treated by the wastewater treatment facilities would not be increased to cause adverse impact. Additionally, the Proposed Project would be required to comply with the Los Angeles County Sanitation District's (LACSD) wastewater ordinance (RR USS-1), which requires that all wastewater discharges to LACSD's facilities comply with the discharge standards.

- **Impact 5.13-2:** Project-generated wastewater could be adequately treated by the wastewater service provider for the Project. (Thresholds U-2 (part) and U-5)

As stated in PDF USS-1, the Project's specifications would require that connections from the existing onsite sewage pipelines to new onsite buildings are provided. Improvements and upgrades to the existing wastewater system would be phased and coordinated to minimize any disruption of service. No increased wastewater services demands would be created during construction compared to the existing conditions that would require new or expanded wastewater facilities.

The Proposed Project would implement PDF USS-2, PDF USS-3, and RR USS-2 to conserve water and would improve outdated wastewater infrastructure by implementing PDF USS-1 and RR USS-2. The Proposed Project would decrease the overall volume of wastewater demands at the Project Site.

- **Impact 5.13-3:** The Proposed Project would be served by sufficient water supplies without procurement of additional water entitlements. (Thresholds U-2 (part) and U-4)

The LADWP's Urban Water Management Plan indicated that there are adequate water supplies through planning year 2035 under regular, single-dry, and multiple-dry year weather conditions to meet the total demands in the service boundaries. Because the Proposed Project would result in less total water demands than the existing MCJ facility, sufficient water supplies are available to serve the Proposed Project by the LADWP.

- **Impact 5.13-4:** Implementation of the Proposed Project would not adversely impact a landfill with insufficient capacity or adversely impact the County's ability to comply with related solid waste regulations. (Thresholds U-6 and U-7)

Sunshine Canyon Landfill has adequate capacity to accommodate the proposed short-term C&D waste with its daily residual disposal capacity of 4,879 tons. In addition, the Project Site's hazardous materials wastes would be managed, handled, and disposed of by qualified personnel and in compliance with state and County requirements. Construction and demolition waste impacts to landfill capacity would be temporary and would not create a need for additional solid waste disposal facilities to adequately handle Project construction-generated waste.

The Proposed Project would decrease solid waste volume during operation and benefit the regional system. The Proposed Project would be required to be designed, constructed, and operated in accordance with the County's Department of Recycling Program Directives to implement waste reduction and recycling measures (RR USS-4). Therefore, the Proposed Project would not conflict with AB 939 or the County's Source Reduction and Recycling Element and Household Hazardous Waste Element under its Integrated Waste Management Plan.

There are project design features and regulatory requirements that would reduce the Proposed Project's potential utilities and service systems impacts, as listed below:

- PDF USS-1 The Project's specifications will require that the Project include the following on-site utility infrastructure improvement:

RR USS-4 The Project will be designed, constructed, and operated in accordance with the County's Departmental Recycling Program Directives to implement waste reduction and recycling measures.

3.3 FINDINGS ON SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE REDUCED TO A LESS THAN SIGNIFICANT LEVEL

The County finds that the following environmental impacts can and will be mitigated to below a level of significance based upon the implementation of the mitigation measures in the Final EIR. These findings are based on the discussion of impacts in the detailed issue area analyses and cumulative impacts in Section 5, Environmental Analysis of the Draft EIR. An explanation of the rationale for each finding is presented below

3.3.1 Air Quality

- **Impact 5.2-1:** The Proposed Project would conflict with the applicable Air Quality Management Plan under both Options 1 and 2 because it could result in an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of the ambient air quality standards (AAQS).

The Proposed Project would not have the potential to substantially affect SCAG's demographic forecast, and therefore, would not exceed the assumptions in the air quality management plan (AQMP) (Criterion #1). With respect to the second criterion, the analyses in responses to Impacts 5.2-2 and 5.2-3 describe construction impacts and operational impacts of the Proposed Project relative to SCAQMD's thresholds. Both the construction and operational phase impacts during Proposed Project operation are based on SCAQMD's regional significance thresholds, which were established to determine whether a project has the potential to cumulatively contribute to the South Coast Air Basin's (SoCAB's) nonattainment designations. As identified in Impact 5.2-3, long-term impacts (including temporary overlap of construction and operational activities) would result in emissions that exceed the SCAQMD's long-term regional significance thresholds. Consequently, the Proposed Project could result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the AAQS.

Mitigation Measures

See MM AIR-1 through MM AIR-6 below. Mitigation measures applied for Impact 5.2-2, Impact 5.2-3, and Impact 5.2-4 (i.e., MM AIR-1 through MM AIR-6) would reduce the Proposed Project's construction-related and operational-phase criteria air pollutant emissions to the extent feasible to minimize potential conflicts with the SCAQMD AQMP.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County based on the Final EIR and the whole of the record that Mitigation Measures MM AIR-1 through MM AIR-6 are feasible and finds that these mitigation measures will reduce the

impacts related to air quality to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).]

Rationale for Finding

Construction and operational emissions related to the Proposed Project could exceed the SCAQMD's emissions thresholds pertaining to volatile organic compound (VOC) and nitrogen oxides (NO_x), therefore, has the potential to conflict with the AQMP under the second criteria. However, implementation of MM AIR-1 and MM AIR-5 would require use of super compliant interior paints and coatings, and construction equipment with EPA Tier 4 engines during construction to reduce VOC in daily emissions. And implementation of MM AIR-2 through MM AIR-4 would require provision of EV supply equipment (EVSE), limit nonessential vehicle idling to no more than five minutes, and use of super compliant paints and solvents during operation to reduce VOC and NO_x. Incorporation of mitigation measures would reduce VOC and NO_x emissions to below the SCAQMD regional significance thresholds, therefore, the Proposed Project would no longer conflict with the AQMP criteria 2.

Reference

Draft EIR Section 5.2, *Air Quality*.

- **Impact 5.2-2:** Construction activities under both Options 1 and 2 of the Proposed Project during Phase 1 construction activities would generate short-term criteria air pollutant emissions that would exceed the SCAQMD regional construction significance threshold for VOC.

An estimate of the maximum daily construction emissions for the Proposed Project is shown in Table 5.2-10, *Maximum Daily Regional Construction Emissions – Option 1* and Table 5.2-11, *Maximum Daily Regional Construction Emissions – Option 2*, of the Draft EIR. As shown in these tables, construction activities associated with the Proposed Project for Option 1 and Option 2 would generate VOC emissions that would exceed the SCAQMD regional significance threshold. Therefore, Proposed Project-related construction activities would result in potentially significant impacts.

Mitigation Measures

The following mitigation measure was included in the Draft EIR and the Final EIR, and is applicable to the Proposed Project.

Options 1 and 2

- MM AIR-1 The construction contractor for construction activities at the Project Site shall use interior paints and coatings with a volatile organic compound (VOC) content that meets the South Coast Air Quality Management District's "super compliant" standard of 10 grams per liter or less.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measure MM AIR-1 is feasible and finds that this mitigation measure will reduce the impacts related to air quality to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

Construction emissions related to the Proposed Project would result in 106 pounds per day (lbs/day) of VOC, exceeding the SCAQMD's daily emissions threshold of 75 lbs/day for VOC. However, implementation of MM AIR-1 would reduce the maximum daily VOC emissions to 35 lbs/day by requiring the use of super compliant interior paints and coatings, and construction equipment with EPA Tier 4 engines during construction. Therefore, the SCAQMD's VOC daily significance thresholds would not be exceeded.

Reference

Draft EIR Section 5.2, *Air Quality*.

- **Impact 5.2-3:** Long-term operation of the Project under Options 1 and 2 would generate a substantial increase in criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the SoCAB.

The operation phase of Proposed Project would not generate air pollutant emissions that exceed the SCAQMD regional significance thresholds. However, construction emissions could temporarily overlap with operational phase activities during Phase 2, while temporary transport of visitors and employees from the SSPS Site to the Project Site would overlap during both Phase 1 and 2. Therefore, emissions from construction activities could add to the total emissions during Phase 2. The temporary overlap of the construction emissions with operation of Phase 2 of the Proposed Project would result in a short-term exceedance of SCAQMD's NOx regional emissions and contribute to the Proposed Project's exceedance of VOC under both Option 1 and Option 2.

Mitigation Measures

The following mitigation measures were included in the Draft EIR and the Final EIR, and are applicable to the Proposed Project.

Options 1 and 2

Operation

MM AIR-2 The new Spring Street Parking Structure, or Vignes Lot parking structure, and the new parking structure at the Project Site shall be electrically wired to accommodate a Level 2 (240 volt) EV charging. A minimum of five percent of the total parking spaces shall be capable of supporting installation of EV supply equipment (EVSE), which is consistent with the Tier 2 requirements of CALGreen. The location of the EVSE

shall be specified on building plans, and proper installation shall be verified by County Department of Public Works prior to issuance of a Certificate of Occupancy.

- MM AIR-3 During long-term operation of the Proposed Project, the County shall use coatings and solvents with a volatile organic compound (VOC) content lower than required under South Coast Air Quality Management District Rule 1113 (i.e., super compliant paints).
- MM AIR-4 Buses, vendor deliveries, and shuttle buses at the Project Site shall limit nonessential vehicle idling to no more than five (5) minutes at any one location. “No Idling” signs for loading area shall be posted at shuttle stops and loading bays.

Construction and Operation Overlap

See MM AIR-1.

- MM AIR-5 The construction contractor for construction activities at the Project Site shall use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to the County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board’s regulations.

Prior to construction, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the County. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer’s recommendations.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measures MM AIR-2 through MM AIR-5 are feasible and finds that these mitigation measures will reduce the impacts related to air quality to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

The combined operational emissions related to the Proposed Project would result in 78 lbs/day of VOC and 73 lbs/day of NO_x of maximum emissions (i.e., under Option 1), exceeding the SCAQMD’s regional emissions thresholds of 55 lbs/day for both VOC and NO_x. However, implementation of

MM AIR-1 through MM AIR-5 would reduce VOC emissions to a maximum of 50 lbs/day and NO_x emissions to -3 lbs/day under Option 1. Under Option 2, the VOC emissions would be 48 lbs/day and the NO_x emissions would be -4 lbs/day. Incorporation of the listed mitigation measures would reduce VOC and NO_x emissions to below the SCAQMD regional significance thresholds.

Reference

Draft EIR Section 5.2, *Air Quality*.

- **Impact 5.2-4:** The Proposed Project under Option 1 and Option 2 could expose sensitive receptors at the William Mead Homes and inmates-patients at the CCTF to substantial criteria air pollutant concentrations during construction activities.

Under both Option 1 and Option 2, overlap of the anticipated demolition and trenching activities would exceed the screening level construction localized significance thresholds (LST) for PM_{2.5}. Therefore, Project-related construction activities under both Option 1 and Option 2 would expose sensitive receptors to substantial concentrations and impacts would be potentially significant.

Mitigation Measures

The following mitigation measure was included in the Draft EIR and the Final EIR, and is applicable to the Proposed Project.

Options 1 and 2

In addition to MM AIR-5, the following measure shall be implemented during construction at the Project Site.

MM AIR-6 The construction contractor for construction activities at the Project Site shall prepare a dust control plan and implement the following measures during ground-disturbing activities—in addition to the existing requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403—to further reduce PM₁₀ and PM_{2.5} emissions. The County shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering.
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186-compliant, PM₁₀-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection.

- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of three times per day.
- During all construction activities, the construction contractor shall limit on-site vehicle speeds on unpaved roads to no more than 15 miles per hour.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measure MM AIR-6 is feasible and finds that this mitigation measure will reduce the impacts related to air quality to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

The Proposed Project could result in elevated PM_{2.5} concentration levels during Phase 1 construction (i.e., demolition and trenching overlap stage) under Options 1 and 2. With implementation of MM AIR-5 and MM AIR-6 that require dust control measures and low emission construction equipment, the 1.00-acre LST PM_{2.5} emissions would be reduced to 0.49 lbs/day from 3.10 lbs/day under both options, not exceeding the 3 lbs/day.

Reference

Draft EIR Section 5.2, *Air Quality*.

3.3.2 Cultural Resources

- **Impact 5.4-2:** The Proposed Project could cause a substantial change in the significance of an archaeological resource and cause a significant impact.

Project development would involve extensive disturbance of onsite soils and could uncover buried archaeological resources. The Project area history can be traced to the founding of the Pueblo de Los Angeles (i.e., City of Los Angeles) and activities associated with agriculture (vineyards), possibly residential complexes, and early industrial/commercial uses (L.A. Pressed Brick Co. and Gladding, McBean and Co. facilities). Therefore, identified historic archaeological resources could be associated with the Spanish, Mexican, and/or American periods. In addition, Native American consultation indicated that the Project area was known to have been within the territory inhabited by Native Americans (Gabrieliño/Tongva) and sensitive for resources associated with the village of Yangna. Given its proximity to the Los Angeles River and the City center, in general the area is considered highly sensitive for archaeological resources. Thus, based on the relative sensitivity for the area to yield evidence of historic archaeological and archaeological resources, soil disturbance could damage such subsurface resources, and impacts would be potentially significant.

Mitigation Measures

The following mitigation measure was included in the Draft EIR and the Final EIR, and is applicable to the Proposed Project.

MM CUL-1 Prior to the start of construction activities, a qualified archaeologist shall be retained by the County to attend the pregrading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The archaeologist shall determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance in the uppermost layers of sediment, including the younger Quaternary Alluvium. If any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, as appropriate, and the resources shall be protected from further disturbance until the qualified archaeologist evaluates them using standard archaeological protocols. The archaeologist must first determine whether an archaeological resource uncovered during construction is a “tribal cultural resource” pursuant to Section 21074 of the California Public Resources Code, a “unique archaeological resource” pursuant to Section 21083.2(g) of the California Public Resources Code, or a “historical resource” pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a tribal cultural resource, unique archaeological resource, or historical resource, the archaeologist shall formulate a mitigation plan in consultation with the County that satisfies the requirements of the above-listed code sections. Upon approval of the mitigation plan by the County Director of Public Works, the Proposed Project shall be implemented in compliance with the mitigation plan.

If the archaeologist determines that the resource is not a tribal cultural resource, unique archaeological resource, or historical resource, she/he shall record the site and submit the recordation to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the County and to the CHRIS at the SCCIC at California State University, Fullerton.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measure CUL-1 is feasible and finds that this mitigation measure will reduce the impacts related to cultural resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

MM CUL-1 calls for a qualified archaeologist to be retained by the County to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. If any archaeological resources are discovered, construction activities within 50 feet of the discovery will be ceased and the archaeologist will determine whether an archaeological resource uncovered during construction is a “tribal cultural

resource”, a “unique archaeologist resource”, or a “historical resource” based on applicable code sections. If the archaeological resource is determined to be a tribal cultural resource, unique archaeological resource, or historical resource, a mitigation plan will be formulated in consultation with the County and measures identified in the mitigation plan will be implemented. As a result, potential impacts to archaeological resources would be less than significant after mitigation.

Reference

Draft EIR Section 5.4, *Cultural Resources*.

- **Impact 5.4-3:** The Proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature and cause a significant impact.

The Project Site, SSPS Site, and Vignes Lot are highly sensitive for the presence of paleontological resources. The onsite geologic units are characterized by shallow younger Quaternary alluvial deposits underlain by older alluvial deposits, which are known to yield paleontological specimen (vertebrate fossils) (Converse 2015). Any substantial excavations on or adjacent to the Project Site, SSPS Site, or Vignes Lot are likely to impact the older Quaternary deposits. Project development would involve extensive excavation of soils, exposing underlain natural deposits, and could therefore potentially impact paleontological resources. Impacts would be potentially significant.

Mitigation Measures

The following mitigation measure was included in the Draft EIR and the Final EIR, and is applicable to the Proposed Project.

MM CUL-2 Prior to the start of ground-disturbing activities in native soils, a qualified paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary alluvium on the Project Site. The designated paleontologist shall be present during the pre-grading meeting to discuss paleontological sensitivity. The paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on the on-site soils and final grading plans.

All paleontological work to assess and/or recover a potential resource at the Project Site shall be conducted under the direction of the qualified paleontologist. If any fossil remains are uncovered during earth-moving activities, all heavy equipment shall be diverted at least 50 feet from the fossil site until the monitor has had an opportunity to examine the remains and determines that earth-moving can resume. The extent of land area that is prohibited from disturbance shall be at the discretion of the paleontological monitor. Samples of older Quaternary alluvium shall be collected as necessary for processing and shall be examined for very small vertebrate fossils. The paleontologist shall prepare a report of the results of any findings following accepted professional practice.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measure CUL-2 is feasible and finds that this mitigation measure will reduce the impacts related to cultural resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

MM CUL-2 calls for a qualified paleontologist to be presented during the pre-grading meeting, and the qualified paleontologist, based on consultation with the County, will determine when monitoring of grading activities is needed based on the onsite soils and final grading plans. The paleontologist will monitor excavations into undisturbed deposits in the older Quaternary alluvium. If any fossil remains are uncovered, all heavy equipment will be diverted at least 50 feet from the fossil site until the monitor evaluates the find and determines that earth-moving can resume. The paleontologist shall prepare a report of the results of any findings following accepted professional practice. As a result, potential impacts to paleontological resources would be less than significant after mitigation.

Reference

Draft EIR Section 5.4, *Cultural Resources*.

- **Impact 5.4-5:** The Proposed Project could cause a substantial adverse change in the significance of a tribal cultural resource as defined in California Public Resources Code Section 21074 and cause a significant impact.

The Project Site, SSPS Site, and Vignes Lot have been previously developed and do not contain tribal cultural resources as defined by PRC Section 21074. However, as discussed in Impact 5.4-2, Native American consultation indicated that the Project area was known to have been within the territory inhabited by Native Americans (Gabrieliño/Tongva) and sensitive for resources associated with the village of Yangna. Therefore, grading activities could disturb previously unidentified tribal cultural resources and impacts would be potentially significant.

Mitigation Measures

See MM CUL-1.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measure CUL-1 is feasible and finds that this mitigation measure will reduce the impacts related to cultural resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

MM CUL-1 calls for a qualified archaeologist to be retained by the County to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. If any tribal resources are discovered, construction activities within 50 feet of the discovery will be ceased and the archaeologist will determine whether an archaeological resource uncovered during construction is a “tribal cultural resource”, a “unique archaeologist resource”, or a “historical resource” based on applicable code sections. If the archaeological resource is determined to be a tribal cultural resource, a mitigation plan will be formulated in consultation with the County and measures identified in the mitigation plan will be implemented. As a result, potential impacts to tribal resources would be less than significant after mitigation.

Reference

Draft EIR Section 5.4, *Cultural Resources*.

3.3.3 Hazards and Hazardous Materials

- **Impact 5.7-2:** The Proposed Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

Abatement plans for removal of asbestos-containing material (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs), and mercury-containing light tubes for some of the Project Site structures are included in Appendices J-4, J-6, J-8, J-10, J-12, J-14, J-16, J-18, and J-20 of this EIR. However, for structures that have not been sampled for asbestos and LBP, additional mitigation would be required to prevent the accidental release of asbestos and lead exposure. Additionally, the Project Site is close to high pressure utility lines and high voltage electrical lines. However, as required by RR HAZ-7, new construction within 10 feet or crossing high-pressure pipelines, natural gas/petroleum pipelines, or electrical lines would be required to notify and coordinate with the provider prior to excavation. Therefore, impacts related to utility lines would be less than significant. Compliance with PDF HAZ-1 through PDF HAZ-5 and RR HAZ-1 through RR HAZ-5 would reduce the potential impacts identified by the hazardous materials surveys conducted for the Proposed Project. However, additional mitigation is necessary to handle accidental discovery of asbestos and LBP during construction. Therefore, this impact would be potentially significant.

Mitigation Measures

The following mitigation measures were included in the Draft EIR and the Final EIR, and are applicable to the Proposed Project.

Options 1 and 2

MM HAZ-1 In the event that building materials are encountered during construction / demolition activities that are suspected of being asbestos-containing materials (ACMs), these materials shall be assumed to contain asbestos and shall be handled, removed,

transported, and/or disposed of in accordance with applicable ACM regulations until such time that they can be sampled and evaluated for asbestos content.

MM HAZ-2 In the event that painted or ceramic surface materials are encountered during construction/demolition activities that are suspected of containing lead and/or lead-based paint, these materials shall be assumed to contain lead in concentrations exceeding the Los Angeles County Health Agency's definition of 0.7 milligrams per square centimeter (mg/cm² or 600 parts per million) and shall be handled, removed, transported, and/or disposed of in accordance with applicable regulations for lead content until such time that they can be sampled and evaluated for lead content.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measures MM HAZ-1 and MM HAZ-2 are feasible and finds that these mitigation measures will reduce the impacts related to hazards and hazardous materials to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

There are existing structures on the existing MCJ that have not been sampled for asbestos and LBP but could contain these materials. If left undisturbed, there is no existing risk to staff, visitor, or inmates from these materials. During construction, in the event that building materials are suspected of being ACMs are encountered, or painted or ceramic surfaces are suspected of containing LBP, MM HAZ-1 and MM HAZ-2 would be implemented to ensure that appropriate protocols are followed and materials abated.

Reference

Draft EIR Section 5.4, *Hazards and Hazardous Materials*.

- **Impact 5.7-4:** The Project Site is included on a list of hazardous materials sites, and as a result, could create a significant hazard to the public or the environment.

Demolition of the existing facilities and construction and operation of the proposed facilities could cause substantial hazards to persons and the environment arising from identified soil and soil vapor contamination (including but not limited to arsenic, lead, copper, TPH-d, and tetrachloroethylene (PCE) in the soil matrix; and naphthalene, PCE, and trichloroethylene in the soil vapor samples). During a two-part seasonal indoor air quality assessment conducted for the area where the former PCE underground storage tank (UST) was located, which is within the Temporary Women's Holding Cells area, it was determined that cancer risk levels and non-carcinogenic health hazard levels from VOCs for jail staff, visitors and inmates are within acceptable exposure levels. Therefore, if left undisturbed, the identified recognized environmental condition (RECs) would not result in substantial safety impacts to existing staff, visitors and inmates. However, because the full extent of hazardous materials impacts could not be evaluated in other areas prior to demolition

of the MCJ structures and the construction would require soil disturbance, impacts are considered potentially significant.

Mitigation Measures

The following mitigation measures were included in the Draft EIR and the Final EIR, and are applicable to the Proposed Project.

Option 1

MM HAZ-3 Following demolition of the Men's Central Jail facilities in the vicinity of the Bus Yard, Sally Port and Parking Garage, and Dispenser Area as identified in Figure 2, *Site Layout and Boring Location Map*, of the Step-Out Investigation, Men's Central Jail, dated September 19, 2016 by Alta Environmental (Step-Out Investigation), a qualified environmental professional meeting ASTM standards shall conduct the following activities under the oversight of the Los Angeles County Fire Department or other applicable government agency in accordance with the Step-Out Investigation recommendations.

- Additional investigation (further step-out borings) in the vicinity of elevated concentrations of copper and lead identified in shallow samples from borings within the vicinity of the Sally Port (boring location B10B) and Bus Maintenance Facility (boring location B16).
- Perform quarterly groundwater monitoring as proposed by the County of Los Angeles Fire Department.
- Profile and investigate lateral and vertical extent of impact if stained, odorous, or otherwise suspicious soil is encountered during construction activities.
- Remedial action.

MM HAZ-4 The results of the additional site investigations as required by MM HAZ-3 along with the pertinent site assessment documents shall be submitted to the appropriate reviewing agency (i.e., County of Los Angeles Department of Public Health, County of Los Angeles Fire Department, Regional Water Quality Control Board) for review and coordination. The County will comply with the oversight agency's determination as to whether cleanup is required. Cleanup activities would be consistent with all applicable state and local rules, regulations, and laws. A cleanup would not be considered complete until confirming samples of soil and/or groundwater reveal levels of contamination below the standards established by the oversight agency. In conjunction with the additional site assessment, if required by the oversight agency, a risk assessment may be prepared for the site to determine that there are no human or environmental risks associated with leaving contamination below specific levels in place. Construction in the impacted area shall not proceed until a "no further action" clearance letter or similar determination is issued by the oversight agency and provided to the County.

MM HAZ-5 Prior to grading of the Spring Street Parking Structure site, a qualified environmental professional meeting ASTM standards shall perform the following in accordance with the recommendations included in the Phase II Environmental Site Assessment for the Spring Street Parking Structure dated February 6, 2015:

- Step-out borings to a maximum depth of 10 feet below grade surface (bgs) near Boring Location B9 near the north boundary, as shown in Figure 2, *Site Layout and Proposed Boring Location Map*, of the Phase II to assess the lateral extent of lead impact.
- Step-out borings with soil samples collected for VOCs to a maximum depth of 10 feet bgs and soil vapor samples collected at depths of 5 feet and 10 feet bgs in the vicinity of Boring Locations B2 and B4 near the center of the site, as shown in Figure 2 of the Phase II, *Site Layout and Proposed Boring Location Map*, to assess the lateral extent of benzene impact.

MM HAZ-6 The results of the additional site investigations as required by MM HAZ-5 along with the pertinent site assessments documents shall be submitted to the appropriate reviewing agency (i.e., County of Los Angeles Department of Public Health, County of Los Angeles Fire Department, Regional Water Quality Control Board) for review and coordination. The County will comply with the oversight agency's determination as to whether cleanup is required. Cleanup activities would be consistent with all applicable state and local rules, regulations, and laws. A cleanup would not be considered complete until confirming samples of soil and/or groundwater reveal levels of contamination below the standards established by the oversight agency. In conjunction with the additional site assessment, if required by the oversight agency, a risk assessment may be prepared for the site to determine that there are no human or environmental risks associated with leaving contamination below specific levels in place. Construction in the impacted area shall not proceed until a "no further action" clearance letter or similar determination is issued by the oversight agency and provided to the County.

Option 2

See MM HAZ-3 and MM HAZ-4.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measures MM HAZ-3 through MM HAZ-6 are feasible and finds that these mitigation measures will reduce the impacts related to hazards and hazardous materials to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

MM HAZ-3 requires, following demolition of the Project Site in the vicinity of the identified RECs, that additional investigation as recommended by the Step-out Investigation (Appendix J-25) be performed by a qualified environmental professional meeting ASTM standards. In addition, MM HAZ-4 would ensure that the Project Site is remediated and a “no further action” clearance or similar determination is issued by the appropriate oversight agency. Therefore, these mitigation measures would reduce potential impacts associated with hazards and hazardous materials at the Project Site to less than significant.

Under Option 1, implementation of MM HAZ-5 and MM HAZ-6 would ensure that additional site investigation is performed for the extent of lead and benzene impacts and that the SSPS Site receives a “no further action” clearance or similar determination by the appropriate oversight agency. Therefore, these mitigation measures would reduce potential impacts associated with hazards and hazardous materials to less than significant at the SSPS Site. Accordingly, Impact 5.7-4 would be less than significant for Option 1 with implementation of MM HAZ-3 through MM HAZ-6.

Under Option 2, implementation of MM HAZ-3 and MM HAZ-4 would ensure that potentially significant hazardous materials impacts associated with the Project Site are reduced to a less than significant level. Hazardous materials impacts related to the Vignes Lot are less than significant without mitigation. Therefore, with implementation of MM HAZ-3 and MM HAZ-4, Impact 5.7-4 would be less than significant.

Reference

Draft EIR Section 5.7, *Hazards and Hazardous Materials*.

3.3.4 Noise

- **Impact 5.10-2:** The Proposed Project under Option 1 could result in vibration-induced architectural damage to buildings bordering the SSPS Site, but would not result in groundborne vibration-related impacts under Option 2.

The nearest building to the SSPS Site is the building to the north, which is immediately adjacent to the edge of the construction site. Construction-related vibration levels from the SSPS Site at this north building have the potential to exceed the criteria for architectural damage (i.e., 0.200 in/sec peak particle velocity [PPV]) if a vibratory roller is operated within 30 feet of the building or if a large bulldozer or loaded truck is operated within 15 feet. However, other buildings are 40 feet to the south of the SSPS Site boundary, 55 feet away across New High Street, and 70 feet away across Spring Street; therefore, impacts at these buildings would be less than significant.

Although no vibratory rollers are expected to be used at the SSPS Site, there is still some potential for architectural damage at the closest off-site buildings depending on the types of common construction equipment used and their distances to the receptor buildings. Therefore, there are potentially significant vibration impacts related to architectural damage to the building that border the SSPS Site to the north.

Mitigation Measures

The following mitigation measure was included in the Draft EIR and the Final EIR, and is applicable to the Proposed Project.

Option 1

MM NOI-1 During construction of the Spring Street Parking Structure, vibratory rollers shall not be operated within 30 feet of off-site buildings, and large bulldozers and loaded trucks shall not be operated within 15 feet of off-site buildings.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that MM N-1 is feasible and finds that this mitigation measure will reduce the impacts related to noise to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

There are no off-site buildings within 15 feet of the Project Site and the Vignes Lot that are subject to vibration impact during construction. However, under Option 1, the SSPS Site is bounded by buildings to the north and to the south, where operation of large construction equipment such as vibratory rollers, large bulldozers, and loaded trucks within 15 feet of off-site buildings could result in vibration impact greater than 0.200 in/sec PPV. MM NOI-1 would require that vibratory rollers are not operated within 30 feet of offsite buildings, large bulldozers and loaded trucks are not operated within 15 feet of offsite buildings, therefore, providing additional preclusion of architectural damage due to vibration. Therefore, impacts would be reduced to a less than significant level.

Reference

Draft EIR Section 5.10, *Noise*.

3.3.1. Transportation/Traffic

- **Impact 5.12-1:** The Project-related trip generation could adversely impact the performance of the area circulation system during construction. (Threshold T-1 [part])

The hours of construction for the Proposed Project would be between 7 AM and 7 PM daily, except Sundays and holidays (per County regulations). The number of construction-related trips would vary during different phases and stages of construction. Based on the CalEEMod model run assumptions, the maximum daily trips would be 1,157 trips (i.e., 771 worker trips and 386 vendor trips) during building construction stage and 22 haul trips. Parking for some or all construction workers would be located off-site in the early phases of construction. If construction were to begin at 7:00 AM, most workers to be on-site before the AM peak period, thereby avoiding the weekday AM commute peak period. Although most construction workers would remain on-site throughout the day, some could depart during the PM peak period. Given the level of existing and projected traffic at some of the study intersections near the Project Site, the SSPS Site and the

Vignes Lot, it is possible that the combination of pour truck/delivery truck traffic and employee traffic could cause temporary adverse impacts at some intersections during the construction period.

Potential impacts associated with construction of the Proposed Project (e.g., partial lane closures) would be limited to those locations immediately adjacent to the Project Site, the SSPS Site or the Vignes Lot. Segments of North Vignes Street and Bauchet Street would have short-term impacts at locations where curb cuts, curb landscaping, etc., are installed. Temporary lane and sidewalk closures along the adjacent streets could be necessary during construction. Therefore, construction of the Proposed Project could result in temporary adverse traffic impacts in the immediate vicinity of the Project Site, the SSPS Site or the Vignes Lot, leading to localized congestion. Therefore, Project construction impact would be potentially significant.

Mitigation Measures

The following mitigation measures were included in the Draft EIR and the Final EIR, and are applicable to the Proposed Project.

Options 1 and 2

Where construction activities would occur within a public street right-of-way around the Project Sites, the following mitigation measure would apply at the Project Site, the SSPS Site, and the Vignes Lot:

MM TRAN-1 A site-specific construction worksite traffic control plan shall be prepared and submitted to Los Angeles Department of Transportation (LADOT) for review and approval prior to the start of any construction work within the public right-of-way. This plan shall include such elements as the location of any lane closures, restricted hours during which lane closures (if any) would not be allowed, local traffic detours (if any), protective devices and traffic controls (such as barricades, cones, flag persons, lights, warning beacons, temporary traffic signals, warning signs), access limitations for abutting properties (if any), and provisions to maintain emergency access through construction work areas. The Proposed Project will be required to comply with the LADOT approved plan measures.

Where construction activities would occur within a public street right-of-way around the Project Sites, the following mitigation measure would apply at the Project Site, the SSPS Site, and the Vignes Lot:

MM TRAN-2 The County of Los Angeles shall provide safety precautions for pedestrians and bicyclists through such measures as protection barriers and signage indicating alternative pedestrian and bicycle access routes where existing facilities would be affected. This would include the safety precautions for the sidewalks on the perimeter of the Project Site.

Where construction activities would occur within a public street right-of-way around the Project Sites, the following mitigation measure would apply at the Project Site, the SSPS Site, and the Vignes Lot:

MM TRAN-3 The County of Los Angeles shall provide advance notice of planned construction activities to any affected residents, businesses and property owners in the vicinity of the construction site.

Where construction activities would occur within a public street right-of-way around the Project Sites, the following mitigation measure would apply at the Project Site, the SSPS Site, and the Vignes Lot:

MM TRAN-4 The County of Los Angeles shall provide advance notice of ongoing construction activity and construction hours to emergency service providers (police, fire, ambulance and paramedic services).

Where construction activities would occur within a public street right-of-way around the Project Sites, the following mitigation measure would apply at the Project Site, the SSPS Site, and the Vignes Lot:

MM TRAN-5 The County of Los Angeles shall provide advance notice of ongoing construction activity and construction hours to public transit providers (Metro, LADOT DASH).

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. The County finds based on the Final EIR and the whole of the record that Mitigation Measures MM TRAN-1 through MM TRAN-5 are feasible and finds that these mitigation measures will reduce the impacts related to transportation/traffic to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1)]

Rationale for Finding

Temporary lane and sidewalk closures along the adjacent streets could be necessary during construction. With implementation of MM TRAN-1, the County would be required to prepare a construction traffic management plan, including street closure information, detour plans, haul routes, and staging plans and submit to LADOT for review and approval prior to the start of any construction work. Additionally, the County would implement MM TRAN-2 through MM TRAN-5 to further ensure that proper notifications and signage are provided in advance to minimize construction impacts during the multi-phasing construction. Therefore, traffic impacts during construction would be less than significant.

Reference

Draft EIR Section 5.12, *Transportation and Traffic*.

4.0 SIGNIFICANT AND UNAVOIDABLE IMPACTS THAT CANNOT BE MITIGATED TO BELOW THE LEVEL OF SIGNIFICANCE

The following summary describes the unavoidable adverse impact of the Proposed Project where either mitigation measures were found to be infeasible, or the mitigation measures are under the control of another lead agency. The following impact would remain significant and unavoidable:

4.1. TRANSPORTATION/TRAFFIC

- **Impact 5.12-2:** Project-generated traffic would have a cumulative impact on levels of service at one study area intersection (Main Street & Alpine Street/North Vignes Street (PM peak hour)) during operation for Option 2 only. This impact would be less than significant if Option 1 is selected.

Table 5.12-9 in the EIR shows that in addition to the same five intersections that are projected to operate at level of service (LOS) E or worse during one or both of the peak hours under the base future year condition without the Proposed Project, one additional intersection would operate at LOS E. It also shows that the increase in V/C ratio for this intersection would be 0.040. Under the LADOT guidelines in Table 5.12-4, *LADOT Intersection Traffic Impact Thresholds for Development Projects*, an increase in V/C ratio equal or greater than 0.01 for intersection operating at LOS E or worse after the addition of Project-related traffic would be considered significant impact. The changes in traffic projected to result from the Proposed Project under Option 2 would result in the V/C increase the following intersection to operate at LOS E under Future with Project (Option 2) condition and the project-related increase in V/C ratio is greater than 0.01. Therefore, the impact is considered potentially significant.

Mitigation Measures

Option 2

- MM TRAN-6 **(ID #2) Main Street & Alpine Street/North Vignes Street (PM peak hour):** Prior to issuance of Certificate of Occupancy for the Vignes Lot parking structure, the County shall widen the westbound approach of North Vignes Street to provide a separate right-turn lane at the Main Street & Alpine Street/North Vignes Street intersection.

Finding

Implementation of MM TRAN-6 would reduce project impacts to all intersections and segments to a less than significant level. Additionally, the improvement appears feasible based on a review of available right-of-way and preliminary discussions with LADOT. However, the ability to implement this mitigation measure is subject to the review and approval of LADOT, and is thus dependent on factors beyond the control of the County. Therefore, the County cannot guarantee implementation of the recommended mitigation for the Main Street & Alpine Street/North Vignes Street intersection, and the potential impact could remain significant if off-site parking Option 2 is selected and MM TRAN-6 cannot be implemented. Under those circumstances, Impact 5.12-2 would remain significant and unavoidable and a Statement of Overriding Considerations is required. If this traffic measure is approved, with implementation of the recommended mitigation measures, there will be no unmitigated significant impacts of the Proposed Project under either off-site parking scenario.

5.0 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the EIR.

The four alternatives listed below were considered but rejected during the scoping/planning process based on one or more of the listed criteria: i) failure to meet most of the basic project objectives, ii) infeasibility, or iii) inability to avoid significant environmental impacts.

- 1) Alternative Sites Outside the Current County-wide Jail Sites
- 2) Community Correctional Facility (Private Jail) Contracting
- 3) Modernize Existing Facility
- 4) No Project/Close MCJ/Transfer to Other County Facilities

Alternative Sites Outside the Current County-wide Jail Sites

Under this alternative, the CCTF with 3,885 inmate-patient bed capacity and 2.4 million square feet building area would be developed and operated at a site other than the current County-wide jail sites. The operating County-wide jail sites include the MCJ, TTCF, CRDF, PDC (East), PDC (North), PDC (South), and NCCF as described in Table 7-2 in the Draft EIR, *County Jail Facility Capacity*. Development of a 2.4 million square feet of new building area elsewhere outside the existing County-wide jail sites would likely result in significant and unavoidable operational air quality impacts. Additionally, this alternative may also increase the VMT, resulting in greater GHG emissions and congestion in roadways since more staff and employees would be required to serve multiple locations.

Table 7-1 in the Draft EIR, *Vanir Jail Plan Report Summary of Options*, provides estimated construction and operational costs for each of the jail options. As shown, at the time of this report construction costs ranged from \$1.74 billion (Option 1B) to \$2.32 billion (Option 4), without any site acquisition cost, as the considered sites were already owned by the County, and are currently operating as or have previously operated as a County jail. One of the main objectives of the Proposed Project is to maximize the financial and facility resources available to the County. Alternative sites outside the current County-wide jail system could require additional property rights acquisition, entitlement, infrastructure upgrading, and other siting costs. For example, a 1.96-acre land was sold in downtown Los Angeles (217 W. 1st Street) for \$7.5 million in 2013, a 1.23-acre land (1631 W. 3rd Street) was sold for \$6.8 million in 2014, and a 5,401 square feet land was in market for \$1.89 million near Spring Street and W. College Street in 2016 (CEO 2016). Therefore, assuming a conservative estimate of \$5 million per acre in downtown Los Angeles, it is anticipated that acquisition of 17.7 acre land in downtown Los Angeles would require additional \$88.5 million in site acquisition cost.

It is also the County's primary objective to maintain proximity to downtown Los Angeles' various courts, TTCF, LAC+USC Medical Center, and other county and community support services. Locating the CCTF away from downtown could potentially increase travel time and delay critical treatment for inmate-patients, as some hospitals outside downtown are not equipped to treat the

number of inmates with additional medical needs from the proposed CCTF. Proximity to these County support services would minimize inmate-patient movement and encourage better treatment coordination to provide the best care possible. The Project Site affords ease of access from different modes of transportation (Metro bus, light rail, Metrolink, and Amtrak) for visitors. Locating a jail on a site that is not currently a part of the County-wide jail sites would create unnecessary land use conflicts and extra costs that could be avoided by locating within the existing jail sites. Therefore, this alternative was rejected for further evaluation.

Community Correctional Facility (Private Jail) Contracting

A private jail or for-profit community correctional facility is a place in which individuals are physically confined or incarcerated by a third party under contract to a government agency. Private and/or public jail companies typically enter into contractual agreements with governments that commit inmates and then pay a per diem or monthly rate for each inmate or prisoner in the facility. Under this alternative, some or all of the future inmates at MCJ would be diverted to community correctional facilities. In September 2013, the Board requested a report on the availability of public community correctional facilities to contract with the County (CEO 2013). The purpose of the contract(s) would be to transfer long-term sentenced non-serious, non-violent, non-sexual inmates (N3) to community correctional facilities, which will make local jail bed capacity available for inmates who committed crimes considered serious or violent.

The Public Safety Realignment Act of 2011 (AB 109) authorized counties to contract and transfer low-level offenders to public community correctional facilities; however, counties are not permitted to contract with a private community correctional facility. There are 16 community correctional facilities in California that have bed capacity for over 100 inmates, and only 5 of them are operated publicly. These 5 public facilities are located in the cities of Coalinga, Delano, Susanville, Shafter, and Taft, and the number of beds ranges from 410 to 560 beds. Therefore, housing 3,885 inmate-patients in these public community correctional facilities would not be feasible without expansion or new construction. Furthermore, there are no public community correctional facilities in California that provide Office of Statewide Health Planning and Development (OSHPD) licensed medical facilities to accommodate inmate-patients with mental and medical health care needs.

Because the County is not permitted under AB 109 to contract with private contractors, and public contractors do not have adequate mental and medical care capacity, this alternative was rejected for further evaluation.

Modernize Existing Facility

This alternative would retrofit the existing MCJ facility by making both interior and exterior improvements to bring the facility into compliance with BSCC standards and other building and utility services standards. According to the Vanir Jail Plan Report prepared in July 2013 that evaluated opportunities to reuse parts of MCJ, because of myriad of issues with the buildings, reuse of the MCJ is not practical. The Jail Plan Report concluded that the linear design of the cells and dormitory style housing does not accommodate constant visual supervision to maintain staff and inmate safety. The Jail Plan Report stated that the deteriorating physical condition, including all major building and utility systems, and inadequate dayroom area and outdoor recreation area and opportunities, indicate impracticality in reusing the MCJ to meet the needs of the County to provide appropriate correctional

treatment facility. In May 2007, in a study prepared by GKK as part of the ongoing study of options for improving the MCJ, the feasibility of renovating the existing MCJ facility to allow for an additional 50-year life span was evaluated. The GKK study determined that it may be possible to retrofit the existing MCJ facility to meet the BSCC standards and seismic standards to accommodate the existing MCJ operation. (GKK 2006) While the existing MCJ operation could be accommodated, there is not enough space capacity to also provide the proposed mental and medical treatment program needs.

Therefore, under this alternative, the existing MCJ facility would be modernized to provide incarceration needs for inmates but it would not be practical to provide service needs for inmate-patients to meet the current County objectives for the CCTF. This alternative does not meet the County's diversion efforts providing onsite integration of inmate-patient programming, treatment, and management through building design, resulting in a best practice standards of care for inmate-patients with mental health, medical, substance use, and co-occurring disorder needs. Opportunities for co-location of jail and mental and medical treatment program space would be limited under this alternative. Therefore, this alternative was considered but rejected during the scoping process.

No Project / Close MCJ / Transfer to Other County Facilities

This no project alternative involves closing the MCJ and transferring all inmates to other existing County facilities within the existing County-wide LASD custody system. Other LASD custody facilities that are currently open include TTCF adjacent to MCJ in downtown Los Angeles, CRDF in Lynwood, PDC (East), PDC (North), PDC (South), and NCCF in Castaic. As shown in Table 7-2, *County Jail Facility Capacity Summary*, the County-wide LASD Custody system currently provides 12,953 beds.

The BSCC conducts bi-annual inspections of the County's custody facilities and adjusts the rated capacity based on the Department's use of the existing facilities. The last bi-annual inspection was completed in 2016 with a final report issued to LASD on November 7, 2016. MCJ's rated capacity was 5,108 beds per the last BSCC inspection cycle from 2012 to 2014. MCJ's capacity was subsequently reduced as LASD implements mandated Court actions removing beds or replacing beds with showers improving overall conditions at the facility, the latest BSCC bi-annual inspection report notes these changes with a reduced capacity of 3,592 beds, a reduction of 1,516 beds.

The County has demonstrated a continued and increased focus on diversion from incarceration as it considers this Proposed Project. Its actions to reduce the number of incarcerated people, particularly those with mental illness and/or substance use disorders are based in part on their consideration of the August 4, 2015, District Attorney's report of the Criminal Justice Mental Health Advisory Board, titled "Mental Health Advisory Report: A Blueprint for Change- Providing Treatment, Promoting Rehabilitation and Reducing Recidivism: An Initiative to Develop a Comprehensive Plan for Los Angeles County." One of the key goals of the diversion program is to divert mentally ill people from jail to community mental health treatment programs whenever it is more appropriate including prior to booking, during the intake mental health assessment process, or if determined at any time during incarceration. However, even with full diversion, the report concluded that MCJ or a replacement facility would still be necessary.

Table 7-2 in the Draft EIR also shows that the LASD Custody facilities have been operating over capacity and the conditions worsened over the years. Only PDC (East) is not overcrowded and has a remaining capacity of 862 beds (as of 2016). If MCJ were to close, there is not enough capacity within

the County system to accommodate the MCJ inmates and PDC East could not provide the facilities necessary to serve the inmate-patient population. This alternative was considered but rejected. Table 7-6 in the Draft EIR, *Project Objectives Evaluation: No Project/Close MCJ/Transfer to Other County Facilities*, also shows that this alternative would not meet the objectives of the Proposed Project.

Finding

The County finds that all of the alternatives eliminated from further consideration in the Draft EIR are infeasible and/or would not meet most Project objectives, for the reasons detailed in Section 7.0, *Alternatives to the Proposed Project*.

5.2 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project.

No Project/Continued Use of Existing MCJ Facility

This alternative, which is required by CEQA, evaluates what is reasonably foreseeable if the project is not approved, and is based upon existing conditions and available infrastructure and services. The Project Site is currently developed with a jail facility built in the 1960s and 1970s and court buildings with a combined area of 1,018,843 gross square feet of building area. Under this alternative, the County would continue to make minor fixes and modification to the aging MCJ and its support facilities, including repairing outdated utility and service systems over time. The MCJ is one of the oldest correctional facilities in the County and according to the Vanir Jail Plan Report, the jail facilities that are more than 50 years old are reaching the end of their expected life span for this type of construction and use. The MCJ contains obsolete facilities and design elements that do not meet current correctional standards. The electrical, mechanical, plumbing, and security systems have surpassed a reasonably-expected 30-year life span and are costly and difficult to maintain. At times, custom-made parts are required for the repairs because they are no longer available on the market. No demolition would occur, and the requirements of the BSCC, ADA, and other applicable correctional standards would be difficult to achieve. For example, the BSCC pursuant to Title 24, Sections 1231.3.1, through 1231.3.4, requires correct plumbing fixture ratios for all facilities. However, the outdated MCJ does not meet the required plumbing fixtures-to-inmate ratios. The Vanir Jail Plan Report also reported many ADA accessibility issues with MCJ such as entry thresholds that exceed maximum allowable heights, vestibule door swings that are too narrow, plumbing fixtures at the wrong heights and lacking proper controls. Pursuant to Title 24, Section on 1231.2.10, many of the jail exercise areas do not fulfill the minimum square footage of surface area and capacity to enable the proper amount of exercise time per inmate each day. The current configuration of MCJ is a linear design that inhibits adequate sight lines between staff and inmate-patients creating increased instances of at-risk inmate-patient suicides and preventable jail-related liability claims. The proposed CCTF includes a new IRC with male and female front-loaded screening/assessment/intake processes designed to expedite inmate placement into housing and treatment programs. The new IRC will also include release functions designed from the start to accommodate integrated post-release counseling, services and programs. The existing parking at MCJ and TITCF is inadequate, the proposed CCTF has part of its scope includes a new off-site or onsite parking structure, the County is currently exploring leasing parking spaces and implementing a

connecting shuttle service to address this shortfall. The leased parking spaces and ongoing shuttle costs could continue if not additional parking infrastructure is provided. Furthermore, this alternative would not meet the County's efforts to reduce incarceration and focus on diversion by providing integrated health care programs for mental-health, medical, and substance use disorder treatment needs of inmates. Development of an off-site parking structure would not occur.

Summary of Environmental Effects and Achievement of Project Objectives

The No Project alternative would lessen environmental impacts in the areas of aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, public services, and transportation and traffic; have greater environmental impacts in GHG emissions and utilities and service systems; and have similar impact in the area of land use and planning. Additionally, as no off-site parking structure would be constructed under this alternative, the potentially significant operational impact at the one intersection under Option 2 would be eliminated.

This alternative would not meet any of the objectives of the Proposed Project as the existing MCJ facilities constructed in 1960s and 1970s fail to provide modern correctional detention treatment facility that incorporate the best industry practices and meets all applicable state and federal standards including BSCC. This alternative would not provide adequate building space to prioritize and provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities in one location.

Finding

The County finds that the No Project/Continued Use of Existing MCJ Facility Alternative is infeasible because although it is environmentally superior to the proposed Project, it does not meet any of the Project objectives and it would not realize the benefits of Project implementation.

In making this determination, the County finds that when compared to the alternatives described and evaluated in the Final EIR, the Proposed Project, as mitigated, provides a reasonable balance between satisfying the Project objectives and reducing potential environmental impacts to an acceptable level.

Reduced Capacity CCTF

Under this alternative, the new CCTF would consist of approximately 1.75 million square feet of building area and 3,200 beds, representing an approximately 18 percent reduction in development intensity compared to the Proposed Project with 3,885 beds. This alternative would also result in reduced staffing numbers. Assuming the proposed staff to bed ratio of approximately 0.58 (2,245 staff to 3,885 beds, excluding CTC and IRC), a 3,200 bed CCTF would result in 1,850 staffing. Under this alternative, an off-site parking structure would still be constructed, but the required capacity would be less than the Proposed Project. A recent study conducted by the University of California-Irvine forecasts that the inmate population of Los Angeles County should increase annually, if the current percentage of inmates requiring mental health and medical treatment remains the same, the resulting demand will increase and exceed the capabilities of the Reduced Capacity CCTF. The HMA report dated August 2015 predicts that the current mental health inmate population will double by 2035. Reduction of the CCTF will require the County to provide other treatment or housing options to

accommodate the remaining projected 685 inmate-patients. The existing County-wide jail facilities are currently operating over capacities and do not have the adequate mental and medical treatment beds to permanently house the projected 685 inmate-patients. Therefore, additional treatment and/or housing options would be required, resulting in service delays and inefficiency. This alternative was considered by the Board on September 1, 2015, but was not accepted for evaluation as the Proposed Project because it will not provide sufficient beds to meet the population of inmate-patients in the system, even with increased diversion from incarceration.

This alternative assumed that an off-site parking structure would be constructed but with reduced capacity than the Proposed Project, as the staff and inmate-patient bed number would be reduced. Provided that the other County facilities have temporary capacity to serve approximately 685 inmate-patients, the necessary new construction under this alternative would be less than the Proposed Project. While less overall building area would be constructed under this alternative, the service and staffing would need to be duplicated at other County facilities where inmate-patients are relocated to, and less efficiency in services will likely increase inmate-patient wait times for services (LASD 2015).

Summary of Environmental Effects and Achievement of Project Objectives

This alternative would lessen environmental impacts in the areas of aesthetics, air quality, GHG emissions, hydrology and water quality, noise, transportation and traffic, and utilities and service systems; and have similar impacts in the areas of biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, and public services. This alternative would reduce the potentially significant and unavoidable impact related to traffic under Option 2, although it would not be eliminated.

This alternative would only partially be consistent with the objectives of the Proposed Project because while it would provide a modern correctional detention treatment facility that meets all applicable state and federal standards including BSCC, it would require the remaining 685 inmate-patients to be transferred to other County facilities, which do not have adequate capacity or provide the same level of treatment services as the Proposed Project. At completion, the CCTF under this alternative would reduce County exposure to liability claims and reduce at-risk inmate-patient suicide, but not to the degree provided by the Proposed Project.

Finding

The County finds that the Reduced Capacity CCTF Alternative is infeasible because it would require the remaining 685 inmate-patients to be housed at other County facilities, which are not currently able to provide a comprehensive approach to health care, therefore, only partially meeting the Project objectives. The County finds that this alternative would not meet the anticipated demands of 3,885 inmate-patient beds, thus resulting in inadequate capacity.

In making this determination, the County finds that when compared to the alternatives described and evaluated in the Final EIR, the Proposed Project, as mitigated, provides a reasonable balance between satisfying the Project objectives and reducing potential environmental impacts to an acceptable level.

Increased Capacity CCTF

The Increased Capacity CCTF proposes development of a 4,860-bed CCTF on the Project Site after phased demolition of the existing MCJ facility (compared to the Proposed Project with 3,885 beds). This alternative is consistent with Option 1B proposed by the 2014 Vanir Report. This alternative would increase the building area by approximately 300,000 square feet from the proposed 2.4 million square feet to 2.7 million square feet. The number of staff under this alternative would increase from 2,445 to 2,809, applying the same staff to bed ratio of approximately 0.58. Like the Proposed Project, this alternative would also include construction of an off-site parking structure at the SSPS Site or the Vignes Lot. This alternative is not consistent with the Board's directives on diversion from incarceration and the related reduction in the maximum number of project beds—from 4,860 to 3,885—for the Proposed Project. All other aspects of this alternative would be similar to the Proposed Project.

Summary of Environmental Effects and Achievement of Project Objectives

The Increased Capacity CCTF would result in greater environmental impacts in the areas of air quality, GHG emissions, noise, and utilities and service systems, though still less than significant; and similar impacts in the areas of aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, and public services. Additionally, this alternative would increase the potentially significant and unavoidable impact related to traffic under Option 2. No environmental impacts would be reduced under this alternative, and this alternative would not be considered environmentally superior when compared to the Proposed Project.

This alternative would meet all of the objectives of the Proposed Project. This alternative would provide a modern correctional detention treatment facility that incorporates the best industry practices and would provide a safe environment for inmate-patients, visitors, and staff that meets all applicable state and federal standards, including BSCC. At completion, the CCTF under this alternative would reduce County exposure to liability claims and reduce at-risk inmate-patient suicide. This alternative would avoid land acquisition, entitlement, and other siting costs and prevent new land use conflicts by reusing the existing County-owned detention property.

Finding

The County finds that the Increased Capacity CCTF Alternative would result in greater environmental impacts in five of the studied areas (air quality, GHG emissions, noise, transportation and traffic, and utilities and service systems), therefore, would be environmentally inferior, and no environmental impacts would be reduced under this alternative. This alternative is feasible but is inconsistent with the adopted County policies. This alternative is not environmentally superior compared to the Proposed Project.

In making this determination, the County finds that when compared to the alternatives described and evaluated in the Final EIR, the Proposed Project, as mitigated, provides a reasonable balance between satisfying the Project objectives and reducing potential environmental impacts to an acceptable level.

Alternative Site Location (Pitchess Detention Center)

Under this alternative, the proposed CCTF would be developed on County property currently used for detention facilities at PDC at 29320 The Old Road, in the unincorporated community of Castaic, approximately 41 driving miles from the Project Site. PDC encompasses 2,620 acres and is divided into four facilities. The BSCC capacity rating for PDC (East) is 926 beds, with the 2016 ADP of 64. The current population at this jail is primarily medium-security inmates with a few high-security inmates. The BSCC capacity rating for PDC (North) is 832 beds, with 2016 ADP of 1,410. Low- to high-security inmates are housed in PDC (North). The BSCC capacity rating for PDC (South) is 844 beds, with the 2016 ADP of 1,273. The current population at this jail ranges from low- to medium-security inmates. The current BSCC capacity rating for PDC (NCCF) is 2,214 beds, with the 2016 average daily population of 3,992. The current population at this jail is a mix of custody levels. This alternative site has adequate land available to accommodate a 3,885-bed CCTF totaling 2.4 million square feet without demolishing or remodeling one of the existing facilities. This alternative site has easements owned by oil and utility companies that would require coordination and resolution before any further development could proceed at the site. This alternative could avoid or substantially lessen the lone potentially significant effect of the Proposed Project, but would create new or more impacts in other areas, and the Proposed Project's impacts would be less than significant when all mitigation measures recommended are implemented. Development of an off-site parking structure at the SSPS Site or the Vignes Lot for off-site parking would not be necessary.

Summary of Environmental Effects and Achievement of Project Objectives

The Alternative Site Location (PDC) Alternative would result in greater environmental impacts in all areas except noise, where it would result in similar impacts. This alternative would not be considered environmentally superior when compared to the Proposed Project.

This alternative would only partially be consistent with the objectives of the Proposed Project. Although it would allow construction of a modern correction detention treatment facility that incorporates the best industry practices in care, safety and design features, locating the CCTF away from downtown could potentially increase travel time and delay critical treatment for inmate-patients, as local hospitals near PDC are not equipped to facilitate the quantity of inmates with medical needs. The usefulness of the proposed CCTF in a centrally located location, and in close proximity to TITCF, would be restricted by its location. This alternative would not be as effective if it were to be co-located with the TITCF. Locating the CCTF away from LAC+USC Medical Center will require treatment at local community hospitals requiring additional staff to transport and provide security. This alternative would not benefit from proximity to the LAC+USC Medical Center.

Finding

The County finds that the Alternative Site Location (PDC) is infeasible because it would result in greater environmental impacts in all areas except noise, where it would result in similar impacts. This alternative would attain objectives of the Proposed Project only partially, and is not an environmentally superior alternative compared to the Proposed Project.

In making this determination, the County finds that when compared to the alternatives described and evaluated in the Final EIR, the Proposed Project, as mitigated, provides a reasonable balance between satisfying the Project objectives and reducing potential environmental impacts to an acceptable level.

6.0 STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered “acceptable” (State CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 [b]). The agency’s statement is referred to as a “Statement of Overriding Considerations.” The following sections provide a description of the Proposed Project’s one significant and unavoidable adverse impact and the justification for adopting a statement of overriding considerations.

6.1. SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

Pursuant to Public Resources Code Section 21081(b) and Guidelines Section 15093, the County has balanced the benefits of the Proposed Project against the following unavoidable adverse impact associated with the Proposed Project and has adopted all feasible mitigation measures with respect to this impact: (1) Transportation/Traffic. The County also has examined alternatives to the Proposed Project, none of which both meets the Project objectives to the same extent as the Proposed Project, and is environmentally preferable to the Proposed Project.

The County declares that it has adopted mitigation measures to reduce all of the Proposed Project's environmental impacts to an insignificant level, other than the following:

6.1.1 Transportation and Traffic

Impact 5.12-2

Implementation of MM TRAN-6 (addition of a right-turn lane) would mitigate to a less than significant level the identified impact under Future Year with Project (Option 2) conditions, resulting in a V/C ratio of 0.492 (LOS A) in the AM peak hour and a V/C ratio of 0.772 (LOS C) in the PM peak hour at the Main Street & Alpine Street/North Vignes Street intersection. The ability to implement this mitigation measure is subject to the review and approval of LADOT, and is thus dependent on factors beyond the control of the County. Therefore, the County cannot guarantee implementation of recommended improvement at the Main Street & Alpine Street/North Vignes Street intersection, and could remain significant if off-site parking Option 2 is selected and MM TRAN-6 cannot be implemented. Therefore, Impact 5.12-2 would remain significant and unavoidable. If this traffic measure is approved, with implementation of the recommended mitigation measures, there will be no unmitigated significant impacts of the Proposed Project under either off-site parking scenario.

6.2 PROJECT BENEFITS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The following section describes the benefits of the Proposed Project that outweigh the project's unavoidable adverse effects and provides specific reasons for considering the project acceptable even though the Final EIR has indicated that there will be one significant project impact if mitigation measure MM TRAN-6 (addition of a right-turn lane) cannot be implemented. Accordingly, this Statement of Overriding Considerations regarding potentially significant adverse environmental impacts resulting from the Proposed Project, as set forth below, has been prepared. Pursuant to CEQA Guidelines §15093(c), the Statement of Overriding Considerations will be included in the record of the project approval and will also be noted in the Notice of Determination. Each of the benefits identified below provides a separate and independent basis for overriding the significant environmental effects of the Proposed Project.

Having reduced the potential effects of the Proposed Project through all feasible mitigation measures as described previously herein, and balancing the benefits of the Proposed Project against its potential unavoidable adverse impacts on transportation and traffic if mitigation measure MM TRAN-6 cannot be implemented, the County finds that the following legal requirements and benefits of the proposed project individually and collectively outweigh the potentially significant unavoidable adverse impacts for the following reasons:

- 1. Improved Safety for Inmate-Patients, Visitors and Staff:** The CCTF would be designed as a modern correctional detention treatment facility that incorporates the best industry practices in care, safety and design features, and would provide a safe environment for inmate-patients, visitors, and staff that meets all applicable state and federal standards, including BSCC. Providing such a facility would reduce County exposure to preventable jail-related liability claims and prevent and/or substantially reduce at-risk inmate-patients suicide.
- 2. Building Design to Promote On-Site Integration of Inmate-Patient Programming, Treatment and Management:** The existing MCJ lacks adequate housing and programming space to serve the large severely mentally ill jail population. The Proposed Project would be designed based on treatment-centric model to provide a safe environment inmate-patients, visitors, and staff, providing program space and treatment housing units all on a single level. The design of the CCTF prioritizes the on-site integration of inmate-patient programming, treatment, and management. The CCTF also allows for a direct supervision of housing and programming areas, where the staff would share a workspace inside of the housing units to provide increased supervision and interaction between inmate-patients and staff as a therapeutic community.
- 3. Substantially Increased Treatment and Detention Capacity for Inmate-Patients Requiring Enhanced Specialized Access to Mental and Medical Care:** A comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities onsite would be provided to achieve proximity and to focus on the highest risk inmate-patients with such treatment needs. The Substance Use Disorder Treatment program, Mental Health Treatment Program, Education Based Incarceration (EBI) program, and various on-site specialty medical services would all be housed in the CCTF.

4. **New Inmate Reception Center to Expedite Inmate-Patient Processing with Improved Medical/Mental Health Screening:** The CCTF would create a new IRC to replace and update the existing intake, assessment, and release site for male and female inmates currently at TTCF and CRDF, to expedite inmate-patient processing and speed the arrival of incoming inmate-patients to the appropriate housing for treatment. In the new IRC, both male and female inmates would be assessed for medical and mental health needs and classified prior to assignment to housing, using an “open booking” system where all services would be co-located for efficiency.
5. **Facility Design Complying With Minimum Space and Accessibility Standards:** The CCTF would be designed to meet all minimum space standards and other state and federal legal requirements in the facility design, including BSCC and ADA standards and provide treatment and detention capacity to both male and female inmate-patients. At completion, the new CCTF would maximize accessibility for the physically impaired and provide flexibility to meet future inmate population demands.
6. **Optimized Use of County Financial and Facility Resources:** The Project objective of maximizing the financial and facility resource available to the County would be attained by the Proposed Project because redevelopment of the MCJ site would prevent incurring extra expenses relating to site acquisition, entitlement, and other siting costs. Reusing the MCJ site would also prevent new land use conflicts by trying to develop a new site. The Project Site is located in close proximity to downtown Los Angeles courts, TTCF, LAC+USC Medical Center, and other County and community support services, so that inmate-patient movement within the facility and to offsite facilities can be minimized and resources in those services can be shared and maximized.
7. **Provides Employment Opportunities for Highly Skilled Workers:** The implementation of the Proposed Project will provide employment opportunities for a highly skilled workforce, especially opportunities within the trades and construction industries. During project construction, between 600 and 2,000 design, engineering, and construction-related jobs would be created, depending on the phase of construction (LADPW 2017).
8. **Reduce Vehicle Miles Traveled:** The Proposed Project would be located in downtown Los Angeles near existing transit facilities including Union Station, and Metro Gold, Red, and Purple rail lines, reducing reliance on automobiles, and therefore, having positive impact on the overall vehicle miles traveled in compliance with Senate Bill (SB) 375. It is also the County’s primary objective to maintain proximity to downtown Los Angeles’ various courts, TTCF, LAC+USC Medical Center, and other County and community support services. Locating the CCTF away from downtown could potentially increase travel time and vehicle miles travelled.
9. **Sustainability:** The County’s Energy and Environmental Policy was adopted in 2016 requiring County buildings to achieve a minimum of U.S. Green Building Council’s Leadership in Energy Efficiency and Design (LEED) “Gold” certification. Therefore, implementation of the Proposed Project will replace the existing facilities built in the 1960’s and ‘70’s with a more energy efficient and sustainable facility.

Conclusion

For the foregoing reasons, implementation of the Proposed Project will allow the County to reuse the existing downtown MCJ site and replace it with a new, safe, therapeutic, and rehabilitative facility emphasizing treatment. CCTF will provide comprehensive onsite treatment for both male and female inmate-patients that meets current correctional standards. The design of the CCTF is based on the projected numbers of inmate-patients requiring specialized treatment, and provides an infrastructure system with the flexibility to respond to any future trends in treatment, or re-entry support, while focusing on reducing recidivism, all of which outweigh the unavoidable environmental impacts.

In balancing the benefits of the overall project described above with the Proposed Project's unavoidable and significant adverse environmental impacts, the County finds that the Proposed Project's benefits individually and collectively outweigh the unavoidable adverse impacts, such that these impacts are acceptable. The County further finds that substantial evidence presented in the Final EIR supports adopting the Final EIR despite the Proposed Project's potential adverse impacts.

7.0 FINDINGS ON RESPONSES TO COMMENTS ON THE DRAFT EIR AND REVISIONS TO THE FINAL EIR

The Final EIR contains response to comments, revisions, clarifications, and corrections to the Draft EIR. The focus of the response to comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines Section 15088(cb). The County provided a written proposed response to each public agency on comments made by that public agency on June 8, 2018, as set forth in Section 2.1 of the Final EIR, pursuant to State CEQA Guidelines Section 15088(b).

County staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5 of the CEQA Guidelines.