

1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (Final EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.). Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed Consolidated Correctional Treatment Facility (hereinafter referred to as the “Proposed Project”) have been analyzed in a Draft Environmental Impact Report (Draft EIR) (SCH No. 2015061045) dated October 2017. This document contains the Final EIR for the Lead Agency – the County of Los Angeles (County). According to the CEQA Guidelines, Section 15132, the Final EIR shall consist of:

- (a) The Draft Environmental Impact Report (Draft EIR) or a revision of the Draft;
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the Draft EIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

The purpose of the Final EIR is to respond to all comments received by the County regarding the environmental information and analyses contained in the Draft EIR. Additionally, any clarifications/corrections to the text, tables, figures, and appendices of the Draft EIR generated either from responses to comments or independently by the County are provided in the Final EIR in Section 3.0. The Draft EIR text has not been modified to reflect these clarifications.

The Responses to Comments (Section 2.0 in this Final EIR) include copies of all letters received during and after the close of the Draft EIR public review period, as described further below, as well as the responses to all comments received.

Section 15097 of the State CEQA Guidelines states that the lead agency shall adopt a program for monitoring or reporting on the revisions that it has required for the project and the measures it has imposed to mitigate or avoid significant environmental effects. Section 4.0, Mitigation Monitoring and Reporting Program (MMRP), describes the mitigation program to be implemented by the County for the Proposed Project.

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1.2 THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND PUBLIC REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

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.

1.2.1 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. No specific issues were raised during the scoping meeting. 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.

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1.2.2 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

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- 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, Mandarin Chinese, and Cantonese Chinese translation services were made available, as were copies of the NOA and the Executive Summary in English, Spanish, and Mandarin Chinese, and Cantonese Chinese. Blank self-addressed comment cards were also made available for convenience during the public meeting held on October 30, 2017.

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 Draft EIR public review requirements of Section 15087 of the CEQA Guidelines.

During the comment period, written comments on the Draft EIR were received by the County of Los Angeles Chief Executive Office. The County has reviewed all comments and has determined that no substantial new environmental issues have been raised and that all issues raised in the comments have been adequately addressed in the Draft EIR and/or in the Responses to Comments, Mitigation Monitoring and Reporting Program, and Clarifications to the Draft EIR. The County also prepared a Findings of Facts and a Statement of Overriding Considerations for the one impact found to be significant and unavoidable (i.e., transportation/traffic for Off-site Parking Option 2 only).

1.2.3 Next Procedural Steps

The County Board of Supervisors is required to consider and certify a Final EIR only if it exercises its discretion to approve the Proposed Project in the future. The Final EIR, and related documents will be filed with the County staff's Project recommendations for Board of Supervisors consideration on a future Board of Supervisors agenda. That agenda date is not known at the time of the completion of the Final EIR, but consideration of recommendations relating to the Proposed Project will be publically noticed as required by state law.

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>.

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1.3 PROJECT DESCRIPTION

1.3.1 Project Location

The CCTF, the Proposed Project, would replace the Men’s 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 County-owned Twin Towers Correctional Facility (TTCF), consisting of two jail towers, an Inmate Reception Center (IRC), and the Correctional Treatment Center (CTC).

1.3.1.1 OFF-SITE PARKING: SPRING STREET PARKING STRUCTURE SITE (OPTION 1)

This EIR analyzes 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 0.3 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.

1.3.1.2 OFF-SITE PARKING: VIGNES LOT (OPTION 2)

This EIR also analyzes 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.

1.3.2 Project Summary

Treatment-Centric Model

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. The Proposed Project would include treatment-centric features in the design of housing by providing program space and treatment housing units all on a single level, and programs and treatment rooms in housing units. Housing units would have 40 beds instead of 64 beds. Advantages to a

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treatment-centric CCTF include: housing units designed to function as therapeutic communities, a broader range of on-site treatments, improved medical and mental health assessments at intake, more direct and personalized contact between inmate-patients and staff, reduced inmate-patient movement and improved access to treatment, reduced staff movement, improved suicide prevention, improved disabled access, improved lines of sight and security, improved flexibility for managing fluctuating inmate-patient population, improved access to re-entry services, and reduced recidivism.

Direct Supervision Model

Instead of the traditional monitoring of inmates from an enclosed staff station, the CCTF would mandate a direct supervision model for housing and programming areas. 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. The exception would be High Security Housing (HSH) and High Observation Housing (HOH), where supervision would follow the traditional model.

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 Substance Use Disorder (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.

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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.

Broadened Visitation Programs

As further discussed below, the CCTF would provide opportunities for contact visits, expanded noncontact visiting, video visiting, and professional visiting. MCJ does not provide contact visits.

1.3.2.2 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.

Inmate Reception Center (IRC)

The new IRC would replace and update the existing intake, assessment, and release site for male inmates at TTCF, and the intake, assessment, and release facility for female inmates currently at Century Regional Detention Facility (CRDF). During the intake process, 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.

The new IRC would also enhance the release process by creating adequate space for post-release services and programs administered by the Community Re-entry and Resource Center (CRRC). Re-entry services would be administered by LASD and other County entities in coordination with community-based organizations with a goal of reducing recidivism.

Housing Unit Types

The MCJ was not designed with inmate mental health and medical needs in mind. From 2006 to 2014, the MCJ had a 9-year average inmate population of 4,782 inmates. The overall bed count of the CCTF would be 3,885 beds. Within the 3,885-bed count at the proposed CCTF, 3,680 beds would be dedicated to medical and mental health needs; the remaining 205 beds are proposed for high security needs. Licensed CTC beds are flexible, and can be used based on inmate-patient needs. 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: CTC Mental Health: 240 beds; CTC Medical: 120 beds; HOH: 840 beds;

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Moderate Observation Housing (MOH): 1,800 beds; Medical Outpatient Specialty Housing (MOSH): 480 beds; Medical Detoxification: 200 beds; and HSH: 205 beds.

The CCTF housing unit types are summarized below.

Correctional Treatment Center. (CTC Mental Health and CTC Medical) – The CTC would relocate from TTCF to CCTF. The new CTC would expand the available licensed in-patient beds and treatment space for medical and acute-mental-health treatment programs. The increased number of CTC beds and treatment spaces would allow more inmate-patients to be treated, and the treatment provided would be more efficient compared to the current CTC. The CTC would provide services for those requiring psychiatric crisis intervention as well as medical conditions not requiring hospitalization in a general acute care medical facility. Many inmate-patients admitted to the CTC suffer from dual diagnosis. For this reason, the medical and mental health CTC would be designed to support multidisciplinary care. Smaller housing units provide more direct contact with custody and treatment staff, which improves safety and security. The housing units would also be designed to integrate mental health programming, medication delivery and clinical treatment space at the housing level, reducing the need to escort inmate-patients off the unit and interruptions to healthcare delivery. As inmate-patients progress in their treatment regimens, they can seamlessly transfer to housing units and programs appropriate for their improved condition. Conversely, should an inmate-patient's condition deteriorate, the inmate-patient can swiftly be transferred to a unit providing a higher level of care. Once stable, these inmate-patients would go back to medical or mental health beds or to the general population.

High Observation Housing. (HOH) – The HOH would provide mental health care for inmate-patients who require intensive observation and treatment interventions, including risk precautions, but do not require the inpatient setting of the CTC. There would be four types of HOH: pods with single- and double-occupancy rooms and 4-bed and 8-bed dormitories. Single-occupancy rooms would be used for inmate-patients with higher security classifications as well as inmate-patients whose mental illness status precludes safe placement with a roommate. HOH units would be composed of two side-by-side housing pods with 40 beds each. Each pair of housing pods would share treatment and support space, but the overall social density and size of treatment groups would be kept smaller than for lower acuity housing.

Moderate Observation Housing. (MOH) - The MOH would serve inmate-patients with a broad range of mental health diagnoses who do not require the more intensive services of HOH. There would be five types of MOH: pods with single- and double-occupancy rooms and 8-bed, 20-bed, and 40-bed dormitories. Single-occupancy inmate-patient rooms would be used for those with higher security classifications; inmate-patients without those precautions would be assigned to pods with a greater number of beds per room based on their level of acuity.

Medical Outpatient Specialty Housing. (MOSH) – The MOSH would provide housing for inmate-patients with a variety of medical or mobility issues that prevent them from being housed with general population inmate-patients. These inmate-patients do not require intensive medical care but have some chronic disease condition or are transitioning from a community or CTC level of care back into the general

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population. Inmate-patients in MOSH require some level of nursing assistance, but do not require inpatient medical care. There would be two types of MOSH housing pods: single-bed rooms and dormitories.

Medical Detoxification. Temporary housing is provided for inmate-patients who are being medically managed for the acute physical symptoms of withdrawal associated with cessation of alcohol or drug use. The typical time frame for housing in the detoxification unit is 24 hours to five days. Detoxification housing would have single-bed rooms and dormitory housing units.

High Security Housing. (HSH) – CCTF would include HSH for inmates requiring special handling or security. This population by definition requires the highest level of security and control. Many of these inmates pose a serious danger to others, including staff or other inmate-patients. Some must be kept away from others for their own personal safety and protection. These inmates are the highest level classification of custody and security, and would be located in CCTF to minimize high-security inmate movement to and from intake and release, medical services, and court transportation.

HSH would be provided in single cells, with the exception of five double cells, each of which would be allocated to five separate pods. HSH would be organized into pods of 20 cells, or 20 to 21 beds. Four pods would be grouped to make a unit with support, security, management, and access to other facilities.

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. Upon completion of CCTF, the CAC could potentially be relocated back into a renovation of the vacated existing IRC space at TTCF.
- **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.

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- Under Option 2, a new 3,000-space parking structure would be constructed on the Vignes Lot for long-term use by CCTF and TTTCF 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 TTTCF.
- **Secure Pedestrian Connection to TTTCF.** The existing secure pedestrian bridge connecting MCJ and TTTCF across Bauchet Street would be replaced with either a new bridge or a tunnel under Bauchet Street to connect CCTF and TTTCF for continued secure movement of inmate-patients 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.

1.3.2.3 INMATE-PATIENT 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 inmate-patients 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

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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.

1.3.2.4 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.

1.3.2.5 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 0.3 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 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

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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.

1.4 SUMMARY OF ENVIRONMENTAL IMPACTS

The Notice of Preparation indicated that the Proposed Project will have no impacts on Agriculture/Forestry Resources, Mineral Resources, Population and Housing, or on Recreation and that no further analysis in the Draft EIR is required.

The Draft EIR evaluates the environmental impacts associated with Project implementation. The analysis indicates that implementation of the Project Design Features (PDFs) and compliance with Regulatory Requirements (RRs) will result in the Proposed Project having no impact or less than significant impacts on Aesthetics, Biological Resources, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Public Services and Utilities and Service Systems.

The PDFs are specific design elements incorporated into the Project or standard procedures and will be reflected in the Project's construction specifications and final plans, which will be implemented in accordance with County protocol to prevent the occurrence of, or reduce the significance of, potential environmental effects. RRs are applicable local, state, or federal regulations.

Prior to mitigation, Project implementation 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 Project-generated traffic volumes would result in significant traffic impacts in the PM peak hour at one intersection under cumulative conditions only for the off-site parking at the Vignes Lot scenario - Option 2. Implementation of MM TRAN-6 (involving street widening and a new right turn lane) would mitigate 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

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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 MM TRAN-6 and impacts to Transportation and Traffic 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.

1.5 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final EIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on the Draft EIR.

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