

3. Revisions, Clarifications, and Corrections to the Draft EIR

3.1 INTRODUCTION

This section contains revisions to the Draft EIR based upon: (1) additional, revised, or applicable updated information that was not available at the time of Draft EIR publication; and/or (2) typographical errors. Changes made to the Draft EIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

Page 1-1, Section 1.1, *Introduction*. The following text has been revised for clarification.

The EIR reviewed the 17 environmental topic areas reflected in the State CEQA Guidelines and recommends ~~20~~21 Mitigation Measures as well as ~~22~~17 Project Design Features and ~~30~~38 Regulatory Requirements to be implemented if the Proposed Project is approved.

Page 1-2, Section 1.2.1, *Off-Site Parking: Spring Street Parking Structure Site (Option 1)*. The following text has been revised to correct a typographical error.

It is approximately ~~0.6~~0.63 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.

Page 1-5, Section 1.3.1, *Project Facilities and Operations*. The following text has been added to the Draft EIR for clarification.

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

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Page 1-6, Section 1.3.1, *Project Facilities and Operations*. The following text has been added to the Draft EIR based on updated information that was not available at the time of Draft EIR publication.

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. As described in Appendix B, this change does not result in any new significant impacts or change the analysis contained in the Draft EIR.

Page 1-8, Section 1.3.4 *Off-Site Parking: Spring Street Parking Structure Site (Option 1)*. The following text has been revised to correct a typographical error.

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 0.6₂ mile west of the Project Site.

Page 1-27, Section 1.7 *Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation*, Table 1-1. The following text has been revised to correct an editorial error.

Table 1-1 Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation

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.
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Page 1-28, Section 1.7 *Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation*, Table 1-1. The following text has been revised to correct an editorial error.

Table 1-1 Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation

<p>Impact 5.7.4: The Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and could potentially create a significant hazard to the public or the environment without adequate remediation.</p>	<p>Potentially Significant</p>	<p>Option 1 MM HAZ-3 Following demolition of the Men's Central Jail (MCJ) 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.</p> <ul style="list-style-type: none"> • 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. 	<p>Less Than Significant</p>
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Page 1-31 and 1-32, Section 1.7 *Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation*, Table 1-1. The following text has been revised to correct an editorial error.

Table 1-1 Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation

<p>5.9 HYDROLOGY AND WATER QUALITY</p>	
<p>PDF HYD-1</p>	<p>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:</p> <ul style="list-style-type: none"> • 2014 Low Impact Development Standard Manual • 2013 California Green Building Standards Code • 2006 Hydrology Manual
<p>PDF HYD-2</p>	<p>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 Los Angeles County Code), which</p>

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	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 the 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.

Page 1-33, Section 1.7 *Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation*, Table 1-1. The following text has been revised to correct an editorial error.

Table 1-1 Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation

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

Page 1-34 and 1-35, Section 1.7 *Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation*, Table 1-1. The following text has been revised to correct an editorial error.

Table 1-1 Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation

5.11 Public Services	
PDF PS-1	The CCTF will be designed to incorporate better crime prevention through environmental design (CPTED) features and security <u>technologies than the existing MCJ facility, thereby resulting in improved security for inmate-patients, staff, visitors, and the neighborhood.</u> 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 <u>administrative environment.</u>
PDF PS-2	The Contractor's Specifications will require that the Proposed Project include space to accommodate <u>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.</u>
RR PS-1	The Proposed Project will be designed and constructed in accordance with the County of Los Angeles Fire Code (Los Angeles County Code, Title 32), which incorporates by adoption the 2013 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

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Detention Facilities; and other applicable state and federal requirements.

Page 1-36, Section 1.7 *Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation*, Table 1-1. The following text has been revised to correct an editorial error.

Table 1-1 Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation

5.12 TRANSPORTATION/TRAFFIC	
PDF TRAN-1	<p>Before the opening of the pProposed Project CCTF, Tthe County of Los Angeles will <u>consider</u> 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 considered <u>reviewed for feasibility and</u> implementation following completion of the CCTF.</p> <ul style="list-style-type: none"> • 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 CCTF Project sSite 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 CCTF Project sSite and the SSPS Site into the operational period, and alter the route to better <u>also</u> connect it with the Patsaouras Transit Plaza.

Page 1-38, Section 1.7 *Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation*, Table 1-1. The following text has been revised to correct an editorial error.

Table 1-1 Summary of Environmental Impacts, Project Design Features, Regulatory Requirements, Mitigation Measures, and Levels of Significance After Mitigation

5.13 UTILITIES AND SERVICE SYSTEMS	
PDF USS-1	<p>The Project's specifications will require that the <u>Proposed</u> Project include the following on-site utility infrastructure improvement:</p> <ul style="list-style-type: none"> • New connections of the existing on-site sewage pipelines to ensure connection to new on-site buildings.
PDF USS-2	<p>The Project's specifications will require that the Proposed Project will include the following on-site utility infrastructure improvements:</p> <ul style="list-style-type: none"> • New on-site fire and domestic/potable water pipelines, meters, fire hydrants, and/or other fire safety features that connect to all new buildings, as required by the City of Los Angeles Fire Department and/or City of Los Angeles Department of Water and Power.
PDF USS-3	<p>The Proposed Project will be developed in conformance with the City of Los Angeles Water Efficiency Requirements Ordinance No. 180822 as assumed under the CCTF Water Supply Assessment.</p>
PDF USS-4	<p>The County of Los Angeles has committed to implement the following water conservation measures that are in addition to those required by codes and ordinances.</p>

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- Kitchen faucets with flow rate of 1.5 gallons per minute (gpm) or less
- Inmate-patient dwelling unit showerheads with flow rate of 1.5 gpm
- All other showerheads with flow rate of 1.8 gpm
- ~~Drought tolerant plants~~
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers
- ~~Proper hydro-zoning/ (group plants with similar water requirements together)~~
- ~~Zoned irrigation; and~~
- ~~Landscaping contouring to minimize precipitation runoff.~~

PDF USS-5 The Project's specifications will require that the Proposed Project be developed in conformance with the County's Tree Planting Ordinance found in Title 31 of the County Code.

Page 3-13, Section 3.2.1, *Off-Site Parking: Spring Street Parking Structure Site (Option 1)*. The following text has been revised to correct a typographical error.

The SSPS Site is an existing County-owned surface parking lot located on 1.66 acres, occupying 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 located approximately 0.63 miles west of the Project Site.

Page 3-24, Section 3.4.1.2, *Project Facilities*. The following text has been added to the Draft EIR for clarification.

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

Page 3-24, Section 3.4.1.2, *Project Facilities*. The following text has been added to the Draft EIR for clarification.

The Medical CTC is licensed under the California Code of Regulations, Title 22, Division 5 by the California Department of Health Services. The treatment provided is not intended to be at the acute level, but is similar to that of the skilled nursing facility. CTC is intended to house inmate-patients who do not require general

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acute care level of services but are in need of professionally supervised health care that cannot be provided on an outpatient basis.

Page 3-28, Section 3.4.1.2, *Project Facilities*. The following text has been added to the Draft EIR based on updated information that was not available at the time of Draft EIR publication.

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. As described in Appendix B, this change would not result in any new significant impacts or change the analysis contained in the Draft EIR.

Page 3-32, Section 3.4.1, *Description of the Project*. The following text has been revised to correct a typographical error.

Under Option 1, the Proposed Project also includes the design and construction of an expanded, multi-story off-site parking structure on a current single level parking lot approximately 0.63 miles west of the Project Site.

Page 3-36, Section 3.4, *Project Characteristics*. The following text has been added to the Draft EIR based on updated information that was not available at the time of Draft EIR publication.

3.4.2.1 Preparation Work to Accommodate Interim Relocations

Renovation to existing facilities would be required to accommodate the interim relocations of current MCJ functions during demolition and construction. However, no new facilities would be constructed. Necessary preparation work to accommodate the interim relocations has been identified to include:

1. Limited renovation of the existing PDC East facility to temporarily relocate up to 400 inmates from the MCJ Infirmary;
2. Limited renovation of the existing Metropolitan Courthouse to temporarily accommodate the Central Arraignment Court (CAC) functions; and

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3. Identifying and leasing appropriate existing office space in close proximity to the Metropolitan Courthouse and minor interior renovation to temporarily accommodate the CAC support functions, represented by the County Justice Partners.

1. Pitchess Detention Center East (PDC East) Renovation – Interim Relocation of Men’s Central Jail Infirmary.

The PDC East facility has a current BSCC-rated capacity of 926 male inmates, but as noted in Table 3-1 of the Draft EIR, is currently underutilized with an average daily population in 2016 of 64 inmates, or less than 7 percent of the total capacity. This 6-acre facility exists in a larger secure complex with 3 additional existing custody facilities. Inmates are regularly moved around the County-wide jail system as part of its normal operations. The required renovation activities will not affect its use, BSCC-capacity, personnel, occupant load, parking, or other characteristics, and involve negligible or no expansion to the existing facility.

To accommodate the interim relocation of up to 400 inmates from the infirmary at MCJ before its demolition, the existing PDC East facility would require limited interior and exterior renovation to meet the specialty medical treatment needs of these inmates. This facility is more than 60 years old, with deteriorating electrical, mechanical, and plumbing systems surpassing by far their 30-year expected life span. The proposed renovations include:

- Interior work would include: replacement / repair of existing deteriorating casework, visitation windows, and partitions, flooring and restrooms would be renovated to comply with applicable codes, limited electrical work to support inmate-patient equipment, repairs to existing sewer and water lines and HVAC unit controls, and upgrade of the existing CCTV surveillance camera system. Improvements would be made consistent with ADA guidelines.
- Exterior work: The existing concrete slab and turf would be replaced, and the existing yard would be divided with fencing into two new yards to meet mandated recreation time standards. The existing deteriorating security watch tower, which is beyond its serviceable life and lacks adequate sight lines, would need to be replaced. A fire hose cabinet, new inmate restrooms, and drinking water fountains would also be installed in the recreation yard.

2. Metropolitan Courthouse Renovation – Interim Relocation of Central Arraignment Court.

The existing Metropolitan Courthouse, located at 1945 S. Hill Street, Los Angeles, includes 16 courtrooms, administrative office spaces, parking, and facilities for various court-related programs. Minor interior renovations in up to four courtrooms would be needed to accommodate the interim relocation of the CAC function. The proposed work would not affect its use, capacity, or occupant load, and involve negligible or no expansion to the existing facility. The proposed renovations include:

- Renovating up to four courtrooms, reconfiguring their associated arraignment docks to create adjacent court holding areas, converting existing restrooms into court holding cells, reconfiguring a holding area to create a sally port, reconfiguring existing non-contact interview rooms, renovating a small Sheriff’s work area, and renovating the clerk’s office. This work would also

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include upgrading the fire protection infrastructure to include a fire sprinkler system in some of some remodeled areas, and addressing access, exiting and code compliance requirements between remodeled areas and courthouse points of ingress and egress.

3. County Justice Partners – Leased Office Space for Interim Relocation. The existing CAC function at MCJ is supported by ancillary support functions known as the Justice Partners, which consist of the County Departments of Probation, Public Defender, Alternate Public Defender, and Mental Health. To accommodate the interim relocation of Justice Partners, the County will need to identify and lease existing appropriate office space in close proximity to the Metropolitan Courthouse. The leased office spaces may require some minor interior tenant improvement work to adequately accommodate:

- Up to 85 Probation staff involved in early disposition, electronic monitoring, DNA/Proposition and other court related services as well as the AB109 Program consisting of interviewing post-release community services persons, documents prepared for violation hearings, disposition of warrants and reinstatements;
- Up to 22 Public Defender staff required to provide legal representation to those that cannot afford it;
- Up to seven Alternate Public Defender staff involved with legal defense that the Public Defender is unable to represent, under the AB 109 program; and
- Up to four Mental Health staff associated with the Mental Health Court Linkage Program (MHCLP) serving adult with mental illness involved with the criminal justice system.

Page 5.2-18, Section 5.2.2, *Thresholds of Significance*. The following corrections have been made to the Draft EIR.

Table 5.2-7 SCAQMD Screening-Level Construction LSTs

Acreage Disturbed ¹	Threshold (lbs/day)			
	Nitrogen Oxides (NO _x)	Carbon Monoxide (CO)	Coarse Particulates (PM ₁₀)	Fine Particulates (PM _{2.5})
Project Site (CCTF) – Phase 1²				
SCAQMD ≤1.00-acre LST	74	680	5.00	3.00
SCAQMD 2.50-acre LST	117	1,183	9.33	5.50
SCAQMD 3.06-acre LST	127	1,336	10.83	6.06
SCAQMD 3.50-acre LST	135	1,454	11.99	6.50
Project Site (CCTF) – Phase 2²				
SCAQMD ≤1.00-acre LST	74	680	5.00	3.00
SCAQMD 2.63-acre LST	119	1,217	9.66	5.62
SCAQMD 3.00-acre LST	126	1,319	10.66	6.00
SCAQMD 3.62-acre LST	137	1,488	12.33	6.62
SCAQMD 4.50-acre LST	152	1,725	14.66	7.50
SCAQMD 5.00-acre LST	161	1,861	15.99	8.00

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Table 5.2-7 SCAQMD Screening-Level Construction LSTs

Spring Street Parking Structure Site³				
SCAQMD ≤1.00-acre LST	74	680	23.88	7.47
SCAQMD 1.44-acre LST	89	841	28.26	8.34
SCAQMD 1.66-acre LST	96	923	30.48	8.79
Vignes Lot⁴				
SCAQMD ≤1.00-acre LST	74	680	60.85 16.20	20.54 5.33
SCAQMD 1.44-acre LST	89	841	65.22 20.58	22.07 6.21
SCAQMD 1.66-acre LST	96	923	67.45 22.80	22.85 6.65

Source: SCAQMD 2008a; and SCAQMD 2011. Based on receptors in SRA 1.

¹ Per SCAQMD methodology, acreage disturbed represents the assumed amount of land that can be covered per day by construction equipment based on rate of ground coverage assumed for pieces of equipment, the daily hours of operation, the amount of equipment, and on the project site size.

² LSTs are based on receptors within 82 feet (25 meters).

³ LSTs are based on non-sensitive receptors within 82 feet (25 meters) and sensitive receptors at 245 feet (75 meters).

⁴ LSTs are based on non-sensitive receptors within 82 feet (25 meters) and sensitive receptors at ~~575 feet (175 meters)~~ 175 feet (53 meters).

Pages 5.2-35 to 5.2-36, Section 5.2.4, *Environmental Impacts*. The following corrections have been made to the Draft EIR.

Table 5.2-15 Localized Construction Emissions – Option 2

Source	Pollutants (pounds per day) ¹⁻²			
	NO _x	CO	PM ₁₀	PM _{2.5}
Vignes Lot¹				
Demolition 2018	48	39	5.12	2.88
1.66-Acre LST	96	923	67.45 22.80	22.85 6.65
Exceeds LST?	No	No	No	No
Site Preparation 2018	21	8	3.47	2.14
1.44-Acre LST	89	842	65.22 20.58	22.07 6.21
Exceeds LST?	No	No	No	No
Building Construction 2018	17	14	1.06	1.02
Building Construction 2019	16	13	0.92	0.88
Building Construction + Coating 2019	18	15	1.04	1.01
1.00-Acre LST	74	680	67.45 22.80	22.85 6.65
Exceeds LST?	No	No	No	No
Project Site – Phase 1²				
Demolition + Trenching 2019	54	40	4.92	3.10
Demolition 2019	40	26	4.04	2.25
Paving + Coating 2024	11	16	0.53	0.49
1.00-Acre LST	74	680	5.00	3.00
Exceeds LST?	No	No	No	Yes
Site Preparation 2020	42	22	9.92	6.27
3.50-Acre LST	135	1,454	11.99	6.50

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Table 5.2-15 Localized Construction Emissions – Option 2

Source	Pollutants (pounds per day) ¹⁻²			
	NO _x	CO	PM ₁₀	PM _{2.5}
Exceeds LST?	No	No	No	No
Foundation 2020	26	16	4.07	2.61
2.50-Acre LST	117	1,183	9.33	5.50
Exceeds LST?	No	No	No	No
CCTF Building 2020	39	34	2.23	2.10
CCTF Building 2021	35	33	1.92	1.80
CCTF Building 2022	31	33	1.62	1.52
CCTF Building 2023	29	32	1.40	1.32
3.06-Acre LST	127	1,336	10.83	6.06
Exceeds LST?	No	No	No	No
Project Site – Phase 2²				
Demolition 2024	24	30	3.45	1.40
Demolition 2025	21	29	3.29	1.23
Parking Demo + Paving + Coating 2027	29	36	2.29	1.37
1.00-Acre LST	74	680	5.00	3.00
Exceeds LST?	No	No	No	No
Demolition + Site Preparation 2025	61	64	13.67	7.15
5.00-Acre LST	161	1,861	15.99	8.00
Exceeds LST?	No	No	No	No
Site Preparation 2025	40	35	10.34	5.91
4.50-Acre LST	152	1,725	14.66	7.50
Exceeds LST?	No	No	No	No
Foundation 2025	28	26	4.84	2.58
3.00-Acre LST	126	1,319	10.66	6.00
Exceeds LST?	No	No	No	No
CCTF Building 2025	25	32	1.06	0.99
CCTF Building 2026	25	32	1.06	0.99
2.63-Acre LST	119	1,217	9.66	5.62
Exceeds LST?	No	No	No	No
CCTF + Parking Demo 2027	44	52	2.87	1.93
3.62-Acre LST	137	1,488	12.33	6.62
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.1., SCAQMD 2008b; and SCAQMD 2011.

In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the Project Site are included in the analysis.

¹ LSTs are based on non-sensitive receptors within 82 feet (25 meters) and sensitive receptors at 575 feet (175 meters) 175 feet (53 meters).

² LSTs are based on receptors within 82 feet (25 meters).

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Construction Health Risk Assessment

Construction activities would result in emissions of diesel particulate matter (DPM), which is a TAC. The exhaust of off-road heavy-duty diesel equipment would emit DPM during site preparation, grading, and other construction activities. Health risk assessment is based on risk accumulated over a 70-year lifetime.

SCAQMD currently does not require health risk assessments to be conducted for emissions from construction equipment. However, the County has completed a health risk assessment (HRA) for the Proposed Project and it is included in Appendix A of this Final EIR. The health risks to people serving sentences and working at the Proposed Project were determined from proximate sources of toxic air contaminants. Specifically, DPM emissions from locomotives idling at Union Station and traveling along the adjacent railroad easement and diesel buses servicing Union Station were included in the evaluation. Health risks were determined for inmates and employees (i.e., receptors) present during the first phase of construction and for full project buildout. For the project buildout scenario, air filters with a minimum efficiency rating value (MERV) of 13 were incorporated in the calculations as the Proposed Project includes MERV 13 filters for new buildings. For the phase 1 construction scenario, the Project's current air filter rating (MERV 8) was incorporated in the calculations. For the inmate population and employees, exposure frequencies, exposure durations and number of outdoor hours per week were provided by the County. The results of the HRA are provided in Table 5.2-15a below.

Table 5.2-15a Health Risk Assessment Results

Receptor	Cancer Risk (per million)		Chronic Hazard Index
	Average Exposure Duration	Maximum Exposure Duration	
Inmates – Project Buildout	0.02	0.19	0.010
Inmates – Phase 1 Construction	0.04	0.39	0.020
Employees – Project Buildout	0.48	2.0	0.005
Employees – Phase 1 Construction	0.75	3.1	0.008
SCAQMD Threshold	10	10	1.0
Exceeds Threshold	No	No	No

Source: Office of Environmental Health Hazard Assessment, 2015.

In comparison to the threshold level of 10 in a million, carcinogenic risks are below the significance threshold value for both inmates and employees. Additionally, the chronic hazard index identified for each toxicological endpoint totaled less than one for non-carcinogenic effects. Therefore, chronic non-carcinogenic hazards are below the significance threshold. Based on a comparison to the health risk thresholds established by Office of Environmental Health Hazard Assessment (OEHHHA) and SCAQMD, hazardous air emissions generated by proximate sources of air emissions are not anticipated to pose an actual or potential endangerment to inmate-patients or employees at the Proposed Project.

~~Emissions from construction equipment primarily consist of DPM. OEHHHA has recently adopted new guidance for the preparation of health risk assessments issued in March 2015. OEHHHA has developed a~~

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~~cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. Nevertheless, the Proposed Project under both Options 1 and 2, would be developed in approximately 9 years, which is less than the 30-year exposure period for DPM, and risk accumulated over a 70-year lifetime, and which would limit the exposure to onsite and offsite receptors. For the reasons stated above, it is anticipated that construction emissions would not pose a threat to onsite and offsite receptors at or near the Project Site. Project-related construction health impacts would be less than significant.~~

Pages 5.4-22, Section 5.4.7, *Mitigation Measures*. The following corrections have been made to the Draft EIR.

Impact 5.4-2

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.

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Impact 5.4-3

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 onsite 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.

Pages 5.6-22, Section 5.6.3.1, *Regulatory Requirements*. The following corrections have been made to the Draft EIR.

RR GHG-8 ~~Executive Order B-18-12 called for new or renovated state buildings larger than 10,000 square feet to achieve the~~ 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. In 2007, the County identified a similar policy for County buildings and in 2016, adopted the LEED "Gold" standard under its Energy and Environmental Policy. The Proposed Project would be constructed to achieve the LEED Gold certification or equivalent.

Pages 5.7-34, Section 5.7.3, *Plans, Programs, and Policies*. The following corrections have been made to the Draft EIR.

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.

Pages 5.7-51, Section 5.7.7, *Mitigation Measures*. The following corrections have been made to the Draft EIR.

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

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paint, these materials shall be assumed to contain lead in concentrations exceeding the Los Angeles County ~~Department of Health~~ Agency's Services² 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.

Pages 5.8-23, Section 5.8.3.1, *Project Design Features*. The following corrections have been made to the Draft EIR.

PDF HYD-2 The ~~Contractor's 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.

Pages 5.13-3, Section 5.13.1.3, *Plans, Programs, and Policies*. The following corrections have been made to the Draft EIR.

PDF USS-3 The Proposed Project will be developed in conformance with the City of Los Angeles Water Efficiency Requirements Ordinance No. 180822 as assumed under the CCTF Water Supply Assessment. ~~The Ordinance mandates ultra low flow plumbing requirements for plumbing fixtures installed in new buildings and retrofits, which includes all residential, commercial and industrial projects.~~

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