

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

CEQA requires that an EIR include a discussion of a range of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the Proposed Project and evaluates them, as required by CEQA.

Alternatives discussed in this chapter include a total of eight alternatives as listed below, four alternatives that were considered and rejected during the scoping and four alternatives that were selected for further analysis:

Alternatives Considered and Rejected during the Scoping/Project Planning Process

- 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

Alternatives Selected for Further Analysis

- 1) No Project/Continued Use of Existing MCJ Facility
- 2) Reduced Capacity CCTF
- 3) Increased Capacity CCTF
- 4) Alternative Site Location (Pitchess Detention Center)

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the requirements for the alternatives analysis in the EIR.

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly” (15126.6[b]).

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- “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects” (15126.6[c]).
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (15126.6[e][1]).
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, [.....] as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (15126.6[e][2]).
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project” (15126.6[f]).
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).
- For alternative locations, “[o]nly locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).

For each development alternative, this analysis:

- Describes the alternative,
- Analyzes the impact of the alternative as compared to the Proposed Project,
- Identifies the impacts of the project that would be avoided or lessened by the alternative,
- Assesses whether the alternative would meet most of the basic project objectives, and

Per the CEQA Guidelines Section 15126.6(d), any additional significant effects of the alternatives are to be discussed in less detail than the significant effects of the project as proposed.

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7.1.2 Background on Project Alternatives

7.1.2.1 JAIL PLAN EVALUATION

Vanir Construction Management, Inc. 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 (Jail Plan Report), issued on July 5, 2013, provided a conceptual evaluation of the needs of the County jail system, including a list of Jail Plan Options for the Board to consider.

The Jail Plan Report is included as Appendix C to this EIR. In 2014, the second phase of the Jail Plan Report was prepared to develop programs for the CCTF and Mira Loma Detention Center. This second phase of the study is included in Appendix D to this EIR. The Jail Plan Report identified several critical needs for the County-wide jail system, including the need to: (1) close and demolish MCJ; (2) provide appropriate mental health treatment facilities; (3) restore TITCF to general population inmates; (4) align cell and bed types with inmate population; and (5) reduce crowding in the jail system (Vanir 2013). The Jail Plan Report set forth various options that would address these critical needs and create the correct size County Jail system, provide the proper housing types to accommodate the inmate population, improve public safety, and provide flexibility to adapt to changes over time. The Jail Plan Report Options are summarized in Table 7-1, *Vanir Jail Plan Report Summary of Options*:

Table 7-1 Vanir Jail Plan Report Summary of Options

Option	Description	New Beds	Total Operating Capacity	Total Operating Cost	Total Construction Cost
1A	New CCTF and New Women's Village at PDC	4,800 (CCTF) 1,156 (Female-PDC)	20,645	\$405 Million	\$1.97 Billion
1B	New CCTF and Modernize/Re-Open MLDC	4,800 (CCTF) 1,604 (Female- MLDC)	21,093	\$457 Million	\$1.74 Billion
2	New CCTF and No New Women's Facility	5,800 (CCTF) 0 (Female)	20,489	\$442 Million	\$2.18 Billion\$
3	New CCTF at PDC and Downtown Los Angeles, and New Women's Village at PDC	1,740 (New PDC-CCTF) 3,120 (New Central CCTF) 1,156 (Female- PDC)	20,705	\$430 Million	\$2.09 Billion
4	New CCTF and Modernize/Re-Open MLDC, New Women's Village at PDC, and Close PDC East	5,600 (New CCTF) 1,604 (Female- MLDC)	21,769	\$543 Million	\$2.32 Billion

Source: Vanir 2014.
 CCTF = Consolidated Correctional Treatment Facility
 PDC = Pitchess Detention Center, Castaic, CA
 MLDC = Mira Loma Detention Center, Lancaster, CA

The core of each proposed option was a new treatment focused detention facility called CCTF; it makes up at least 90 percent of the estimated-cost of each option. The CCTF represents a huge investment for the County, both in terms of one-time capital cost and ongoing operational costs. Therefore, this investment proposal was balanced against the benefits to the County of reduced risk, reduced recidivism rates, increased

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public safety, improved health-care outcomes, and better work environment for the thousands of employees treating and caring for the inmate-patients.

In May 2014, the County Board directed that Option 1B be studied, as recommended in the Jail Plan Report. Of the options presented in the Jail Plan Report, Option 1B is the most reflective of the County's decision to evaluate the proposed CCTF project. The components of Option 1B analyzed in that report are summarized below (Vanir 2014):

- Construct new CCTF downtown for inmate medical/mental health services/beds and flexible high security beds;
- Transfer all male and female high- and medium-security risk general population inmates from MCJ and CRDF into TTCF;
- Close and demolish MCJ;
- Modernize and reopen Mira Loma Detention Center to house female inmates (with AB 900 Grant funding), including the required County match funds;
- Convert CRDF from all female to male-only facility;
- Demolish existing Arraignment Courts and 2-level parking structure;
- Construct new boiler plant for TTCF at the downtown Project Site.

On July 16, 2013, the County Board provided direction to various County departments regarding items related to the Jail Plan Report, including direction for Vanir to work with County departments and the CEO to further develop the program for the proposed CCTF including staffing and operating costs. The program development of CCTF was also to include sufficient data and analysis to allow County to initiate design activities. On September 17, 2013, the Board passed a motion highlighting the need to reconcile the concerns of the United States Department of Justice about the treatment of mentally ill inmates with the jail planning effort.

The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. The County, however, has a concurrent focus on diversion from incarceration as it considers the Proposed Project. The Proposed Project is consistent with the Board's consideration of policy issues addressing alternative approaches to incarceration.

The Board has adopted numerous recent actions to reduce the number of people who are incarcerated in the County, particularly those with mental illness and/or substance use disorders. The Board's actions relating to diversion from the criminal justice system to reduce the need for incarceration are based in part on their consideration of the August 4, 2015, District Attorney's report of the Criminal Justice Mental Health Advisory Board (Advisory Board) in a document entitled "Mental Health Advisory Report: A Blueprint for

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Change: Providing Treatment, Promoting Rehabilitation and Reducing Recidivism: An Initiative to Develop a Comprehensive Plan for Los Angeles County.” The members of the District Attorney’s Advisory Board were the Sheriff; the Fire Chief; the Directors of the Departments of Mental Health, Health Services, Public Health, Veteran’s Affairs, and Public Social Services; the Public Defender; and the Executive Director of the County-wide Criminal Justice Coordination Committee. All Advisory Board members participated in the County-wide assessment of services and recommendations to provide for comprehensive mental health diversion for each stage of the criminal justice continuum, from first responders to community re-entry and support. This report summarized the range of diversion programs already existing in the County and analyzed the need for additional mental health and substance abuse diversion services for each stage along the criminal justice continuum. The County CEO has acknowledged that these recommendations recognize that there are potential new efficiencies and cost avoidance by redirecting persons in need of physical, mental, and public health care services from the criminal justice system to appropriate care and treatment in lieu of incarceration.

On August 11, 2015, and September 1, 2015, in the context of determining potential capacity of proposed County jail facilities and responding to treatment needs for the mentally ill or victims of substance use disorders, the Board directed an ordinance be prepared to establish an Office of Diversion and Reentry (Office) within the Department of Health Services. That ordinance was adopted, and the Office has been established pursuant to Section 2.76.600 of the Los Angeles County Code. For administrative oversight, the Board determined the Office is part of the Department of Health Services, and the Director of the Office reports to the Director of the Department of Health Services. The Director of this Office is advised by a Permanent Steering Committee with broad membership from County departments working in collaboration with working groups established by the District Attorney. It includes representatives from the offices of the Sheriff, the Fire Chief, the Chief Executive Office, Superior Court, Public Defender, Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office oversees County-wide diversion efforts including a system of integrated mental, physical, and public health care services as well as supportive housing for those at risk of homelessness who are redirected from the criminal justice system or re-entering the community after incarceration. For purposes of this Office’s jurisdiction, the expectation is for diversion to seamlessly occur across “sequential intercept” points within the criminal justice system. Such intercept points include initial contact with law enforcement or other first responders, involvement with the criminal court system, incarceration, or post-release from incarceration.

The Office was allocated an initial Supplemental Budget of \$74.5 million to be spent 40 percent on housing; 50 percent for diversion and anti-recidivism programs; and 10 percent for administration. The Board directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board also directed that the Office distribute funding so at least one thousand individuals would be diverted across all intercept points within the criminal justice system.

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

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incarceration. In conjunction with the described 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 IRC, and the 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.

7.1.3 Project Goal and Objectives

Project Goal

The Proposed Project's overall goal is 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. 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:

Project Objectives

- 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.

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- 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 onsite 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 off-site 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.

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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 LEED Gold certification for the project.

7.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Pursuant to CEQA Guidelines Section 15126.6(b), alternatives to the Proposed Project include those that avoid or substantially lessen any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Based on the analysis contained in Chapter 5, *Environmental Analysis*, the Proposed Project would result in significant environmental effects prior to mitigation on the topics of air quality, cultural resources, hazards and hazardous materials, noise, and transportation and traffic. Following mitigation, however, impacts to these five topical areas would be avoided or reduced to less than significant levels. Because the traffic mitigation measure to mitigate an intersection impact is subject to the review and approval of LADOT, and is thus dependent on factors beyond the control of the County, the Proposed Project could have one significant and unavoidable remaining environmental impact related to transportation and traffic.

The five environmental topics and a summary of the mitigation measures which would reduce impact to less than significant are as follows:

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 AAQS. Implementation of MM AIR-1 through MM AIR-6 would reduce this potential impact to a less than significant level.
- **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. Implementation of MM AIR-1 would reduce this potential impact to a less than significant level.
- **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. Implementation of MM AIR-1 through MM AIR-5 would reduce this potential impact to a less than significant level.
- **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

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concentrations during construction activities. Implementation of MM AIR-5 and MM AIR-6 would reduce this potential impact to a less than significant level.

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. Implementation of MM CUL-1 would reduce this potential impact to levels considered less than significant.
- **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. Implementation of MM CUL-2 would reduce this potential impact to levels considered less than significant.
- **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. Implementation of MM CUL-1 would reduce this potential impact to levels considered less than significant.

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. Implementation of MM HAZ-1 and MM HAZ-2 would reduce this potential impact to levels considered less than significant.
- **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. Implementation of MM HAZ-3, MM HAZ-4, and MM HAZ-5 would reduce this potential impact to levels considered less than significant.

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. Implementation of MM NOI-1 would reduce this potential impact to levels considered less than significant.

Transportation and Traffic

- **Impact 5.12-1:** The Project-related trip generation could adversely impact the performance of the area circulation system during construction. Implementation of MM TRAN-1 through MM TRAN-5 would reduce this potential impact to levels considered less than significant.

The one environmental topic, Transportation and Traffic, which could have significant and unavoidable environmental impacts notwithstanding the listed mitigation measures, is as follows:

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Transportation and Traffic

- **Impact 5.12-2:** Implementation of MM TRAN-6 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.

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

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. 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

The creation of a new detention center in a location that did not previously accommodate prisoners or inmates would present substantive land use compatibility concerns. The County's jail planning report inventoried and evaluated all existing LASD jail facilities. The County operates seven jail facilities in Los Angeles County, including MCJ, TTCF/CTC, CRDF, PDC (East), PDC (North), PDC (South), and North County Correctional Facility (NCCF). Table 7-2, *County Jail Facility Capacity Summary*, provides the BSCC capacity and the past average daily population (ADP). As shown, 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 IRC, currently located at the TTCF and the 80 booking beds available at the CRDF, a total of 12,953 short- and long-term beds are in the County-wide system. The BSCC-rated design capacity of MCJ was 5,108 beds in 2014. In 2016, the BSCC-rated capacity was reduced to 3,529 beds as LASD implemented mandated Court actions removing beds or replacing beds with showers improving overall conditions at the facility.

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Table 7-2 County Jail Facility Capacity

Facility Name	Inmate Classification	BSCC Rated Capacity Beds	2011 ADP	2011 Percent of Capacity	2012 ADP	2012 Percent of Capacity	2013 ADP	2013 Percent of Capacity	2016 ADP	2016 Percent of Capacity
CRDF	Designed for Male Inmates (Housing Female Inmates): High/Med Security	1,708	1,526	-3.9%	1,843	16.1%	2,069	30.3%	1,982	116%
MCJ ¹	Designed for Male Inmates: High/Med Security	3,529	4,266	-16.5%	4,407	-13.7%	4,257	-16.7%	4,213	119.4%
TTCF	Designed for Male or Female Inmates: High Security	2,484	2,983	32.9%	3,086	37.5%	3,949	76.0%	3,310	133%
PDC (NCCF)	Designed for Male Inmates: Medium Security	2,214	3,905	76.9%	3,751	69.9%	3,768	70.7%	3,992	180.3%
PDC (East)	Designed for Male Inmates: High Security	926	1,591	71.8%	1,696	83.2%	1,476	59.4%	64	6.9%
PDC (North)	Designed for Male Inmates: Medium Security	832	2	-99.7%	3	-99.6%	1,081	40.8%	1,410	169.5%
PDC (South)	Designed for Male Inmates: Medium Security	844	593	-34.5%	1,009	11.4%	1,431	57.9%	1,273	150.8%
TOTAL		12,537	14,866	8.1%	15,795	14.9%	18,031	31.2%	16,244	118.6%

Source: Vanir 2013, BSCC 2013, 2014, 2015, BSCC 2014-2016 Biennial Inspection – Los Angeles County’s Type II Facilities Penal Code Section 6031
 BSCC: California Board of State and Community Corrections
 NA: not applicable

Facility Names

CRDF: Century Regional Detention Facility, Lynwood, CA
 MCJ: Men’s Central Jail, Los Angeles, CA
 NCCF: North County Correctional Facility, Castaic, CA
 PDC: Pitchess Detention Center, Castaic, CA
 TTCF: Twin Towers Correctional Facility, Los Angeles, CA

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7.3.1 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, *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, *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. Table 7-3, *Evaluation of the Project Objectives – Alternative Sites Outside the Current County-wide Jail Sites*, provides an assessment of this alternative's ability to meet the Project objectives.

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Table 7-3 Evaluation of the Project Objectives – Alternative Sites Outside the Current County-wide Jail Sites

Objective	Consistency Analysis
<p>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.</p>	
<p>1. To provide a safe environment for inmate-patients, visitors, and staff.</p> <p>2. Reduce County exposure to preventable jail-related liability claims. Prevent and/or substantially reduce at-risk inmate-patients suicide.</p> <p>3. Design criteria that provide a more therapeutic environment with treatment centric features to enhance the lives of inmate-patients.</p> <p>4. Improve safety of public, staff, and inmate-patients through design and operational best practices that meet BSCC and applicable correctional standards.</p>	<p>Consistent: Construction of a new CCTF outside of the current County-wide jail sites would provide opportunity to create a safe environment through design and operational best practices that meet all applicable standards for inmate-patients, visitors, and staff. However, such construction independent of other County detention system would require additional resources related to site acquisition and also during operation. The MCJ currently shares resources with the adjacent TTCF, and moving to a farther location would consume additional travel time, buses, staff, and cost.</p>
<p>B. To prioritize the onsite 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.</p>	
<p>5. Provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities onsite to achieve proximity and to focus on the highest risk inmate-patients with such treatment needs.</p> <p>6. Provide both treatment program space and clinical staff resources at the Housing Unit level.</p> <p>7. Strive to reduce recidivism by providing onsite mental health, medical, and substance use disorder treatment services, educational programs, and re-entry support resources.</p> <p>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.</p>	<p>Partially Consistent: Construction of a CCTF outside the current County-wide jail sites would create an opportunity to provide a comprehensive approach to inmate-patient programming, treatment, and management through building design. Appropriate siting of a facility outside the County-wide jail sites would still allow the County to co-locate all programming needs on a new site. However, acquiring adequate site close to TTCF, County courts, Los Angeles County USC Medical Center Jail Ward, and other support systems to maximize system-wide resources efficiently would be difficult due to land availability and acquisition cost. The proposed CCTF would benefit from co-location with the TTCF as inmate-patients progress through treatment, they can transition into general population housing.</p>
<p>C. To provide treatment and detention capacity for both male and female inmate-patients requiring enhanced specialized access to mental and/or medical care.</p>	
<p>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.</p> <p>10. Maximize accessibility for the physically impaired.</p> <p>11. Provide a flexible infrastructure that can respond to unforeseen changes in inmate populations.</p>	<p>Consistent: An alternative site outside the County-wide jail sites would provide treatment and detention capacity for both male and female inmate-patients while conforming to all applicable legal requirements in facility design and standards, including maximizing accessibility for the physically impaired and planning for unforeseen changes in inmate population.</p>
<p>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.</p>	
<p>12. Minimize land acquisition, entitlement, and other siting costs. Avoid new land use conflicts by prioritizing the reuse of County-owned detention property.</p> <p>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</p>	<p>Not Consistent: Acquisition and development of a CCTF outside the current County-wide jail sites would not be the best use the County's financial and facility resources, when there are options within the County jail sites. Although County owns other lands outside the jail sites, locating outside the current jail sites would likely create land use conflicts with surrounding land uses and face land use based community opposition and would prevent other public uses or</p>

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Table 7-3 Evaluation of the Project Objectives – Alternative Sites Outside the Current County-wide Jail Sites

Objective	Consistency Analysis
<p>for inmate-patients with mental health, medical, and substance use disorder treatment needs.</p> <p>14. Minimize inmate-patient movement both within the facility and to off-site facilities by locating health and other rehabilitative services onsite where appropriate.</p> <p>15. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF 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.</p> <p>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.</p> <p>17. Comply with the County’s Energy and Environmental Policy and achieve a minimum of LEED Gold certification for the project.</p>	<p>development of the new site. If the County were not to find a suitable location within the County-owned sites and be required to pay; land acquisition costs that would add significant expense. According to the County CEO Real Estate data on active/sold parcels, a conservative estimate of \$5 million per acre of land could be assumed in downtown Los Angeles (CEO 2016). Table 7-1 shows estimated construction cost for each of the options evaluated under the Vanir Jail Plan Report. The listed construction costs do not include costs related to site acquisition as the sites are already owned by the County. Any sites outside the County-owned site would result in additional site acquisition costs. Instead of reducing movements of inmates and inmate-patients, this alternative would likely move the CCTF away from downtown Los Angeles, not meeting the Project objective to maintain proximity to TTCF, LAC+USC Medical Center, and other County and community support services. Locating a new CCTF outside the County jail sites and away from other County supporting facilities would also not meet the objective of optimizing the County’s cost to fund mental-health, medical, and substance use disorder treatment facilities cost.</p>

7.3.2 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 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 is rejected for further

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evaluation. Table 7-4, *Evaluation of the Project Objectives – Community Correctional Facility (Private Jail) Contracting*, provides an assessment of this alternative’s ability to meet the Project objectives.

Table 7-4 Evaluation of the Project Objectives – Community Correctional Facility (Private Jail) Contracting

Objective	Consistency Analysis
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.	Not Consistent: The community correctional facilities (private jails) do not have adequate OSHPD facilities to provide treatment for inmate-patients. This alternative could not provide a safe environment for inmate-patients or provide necessary mental and medical care to reduce County exposure to preventable jail-related liability claims or prevent and/or substantially reduce at-risk inmate-patients suicide.
B. To prioritize the onsite 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 onsite 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 onsite 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.	Not Consistent: Public community correctional facilities’ contractors do not have an OSHPD facility in California and do not have the capacity to provide a comprehensive mental health, medical health, and substance use disorder treatment program in one location as with the proposed CCTF.
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.	Not Consistent: Public community correctional facilities’ contractors currently do not have an OSHPD facility in California and do not have adequate capacity to provide enhanced specialized access to mental and/or medical care.

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Table 7-4 Evaluation of the Project Objectives – Community Correctional Facility (Private Jail) Contracting

Objective	Consistency Analysis
<p>D. Maximize the financial and facility resources available to the County to construct, and maintain and operate a new treatment facility within the County's detention system.</p> <p>12. Minimize land acquisition, entitlement, and other siting costs. Avoid new land use conflicts by prioritizing the reuse of County-owned detention property.</p> <p>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.</p> <p>14. Minimize inmate-patient movement both within the facility and to off-site facilities by locating health and other rehabilitative services onsite where appropriate.</p> <p>15. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF 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.</p> <p>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.</p> <p>17. Comply with the County's Energy and Environmental Policy and achieve LEED Gold certification for the project.</p>	<p>Not Consistent: This alternative would allow the County to avoid construction cost, including land acquisition, entitlement, and other siting costs. However, the available public community correctional facilities are located in cities of Coalinga, Delano, Shafter, and Taft and do not meet OSHPD standards. Maintaining proximity to downtown Los Angeles would not be possible and minimizing inmate movement or optimizing access would not be achieved.</p>

7.3.3 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.

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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.

Table 7-5, *Evaluation of the Project Objectives – Modernize Existing Facility*, provides an assessment of this alternative’s ability to meet the Project objectives.

Table 7-5 Evaluation of the Project Objectives – Modernize Existing Facility

Objective	Consistency Analysis
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.	<p>Not Consistent: According to the 2013 Jail Plan Report, the current design of the MCJ is not conducive to constant visual supervision to maintain officer and inmate safety. MCJ’s deteriorating physical condition also makes it impractical to reuse the existing facilities. Although the existing MCJ facility could be modernized to meet the BSCC and applicable correctional standards based on the 2007 GKK study, such modernization could only accommodate incarceration needs of the County but not the mental and medical treatment program space needs as proposed by the CCTF. Therefore, it would not be consistent with the County’s object to provide a safe environment for inmate-patients, visitors, and staff. Under this alternative, the objective of reducing County exposure to prevent jail-related liability claims would not be met, as 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.</p>
B. To prioritize the 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.	
5. Provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities onsite 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 onsite 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.	<p>Not Consistent: This alternative would not provide adequate building area for onsite integration of all proposed programming, treatment, and management needs. Co-locating all proposed programs would not be possible due to lack of available space and infrastructure within the current facility. The existing IRC split between TTCF and MCJ will remain in use continuing the current intake and assessment processes. Female inmates are currently processed at CRDF. 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.</p>

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Table 7-5 Evaluation of the Project Objectives – Modernize Existing Facility

Objective	Consistency Analysis
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.	<p>Not Consistent: The modernization would accommodate the incarceration needs of the County that conform to all minimum space standards and other applicable requirements. However, this alternative would not provide adequate capacity for a mental, physical, and public health care service system proposed under the Proposed Project. Therefore, under this alternative, the County could not focus on the needed diversion and anti-recidivism programs, and could not provide flexible infrastructure for the current demands or unforeseen future inmate population.</p>
D. Maximize the financial and facility resources available to the County to construct, and 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 off-site facilities by locating health and other rehabilitative services onsite where appropriate. 15. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF 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 LEED Gold certification for the project.	<p>Partially Consistent: This alternative would allow the County to avoid the cost for new land acquisition, avoid new land use conflicts, and maintain proximity to TTCF and other community support services. However, it could not provide the needed treatment program for all inmate-patients, and they would have to be transferred elsewhere in the County system. Therefore, while it could minimize inmate-patient movement and maintain its proximity and optimal access for some inmate-patients, a comprehensive mental health, medical, and substance use disorder programs could not be provided. The existing facility could be modernized and upgraded to meet the current energy efficiency and conservation standards as feasible, and achieve a LEED Gold equivalent certification or similar building standards.</p>

7.3.4 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

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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 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, *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.

Table 7-6 Project Objectives Evaluation: No Project/Close MCJ/Transfer to Other County Facilities

Objective	Consistency Analysis
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.	Not Consistent: This alternative would not allow construction of a centralized modern mental-health, medical, and substance use disorder treatment facility that incorporates the best industry practices in design to provide a safe environment for inmate-patients, visitors, and staff. Instead, it requires shifting inmates to other facilities that are already operating at over capacity, and exacerbate conditions at those facilities. The existing IRC split between TTCF and MCJ will remain in use continuing the current intake and assessment processes. Female inmates are currently processed at CRDF. 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. Existing County facilities have limited programming space, additional inmate-patients would further strain the limited existing programming space available.

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Table 7-6 Project Objectives Evaluation: No Project/Close MCJ/Transfer to Other County Facilities

Objective	Consistency Analysis
<p>B. To prioritize the 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.</p> <p>5. Provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities onsite to achieve proximity and to focus on the highest risk inmate-patients with such treatment needs.</p> <p>6. Provide both treatment program space and clinical staff resources at the Housing Unit level.</p> <p>7. Strive to reduce recidivism by providing onsite mental health, medical, and substance use disorder treatment services, educational programs, and re-entry support resources.</p> <p>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.</p>	<p>Not Consistent: 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. Other County facilities currently do not have the space or resources to co-locate or provide both treatment program space and clinical staff resources at the housing-unit level. This alternative would result in inefficient delivery of services. None of the current County custody facilities are designed from the ground-up as a treatment facility and do not have treatment-centric features.</p>
<p>C. To provide treatment and detention capacity for both male and female inmate-patients requiring enhanced specialized access to mental and/or medical care.</p> <p>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.</p> <p>10. Maximize accessibility for the physically impaired.</p> <p>11. Provide a flexible infrastructure that can respond to unforeseen changes in inmate populations.</p>	<p>Not Consistent: Other County custody facilities do not have adequate capacity to provide specialized mental and/or medical care to both male and female inmate-patients that conforms to the applicable state and federal legal requirements and standards. As other County custody facilities are operating at over capacity except for PDC (East), where it is designed for high security male inmates, closing of MCJ and transferring of inmates would not support creating opportunities for providing a flexible infrastructure that can respond to unforeseen changes in inmate populations (e.g., through diversion or unexpected increase in inmate population).</p>
<p>D. Maximize the financial and facility resources available to the County to construct, and maintain and operate a new treatment facility within the County's detention system.</p> <p>12. Minimize land acquisition, entitlement, and other siting costs. Avoid new land use conflicts by prioritizing the reuse of County-owned detention property.</p> <p>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.</p> <p>14. Minimize inmate-patient movement both within the facility and to off-site facilities by locating health and other rehabilitative services onsite where appropriate.</p> <p>15. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF 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.</p>	<p>Not Consistent: The County would not be maximizing its facility resources. PDC (East) is the only LASD Custody facility that is not overcrowded. Closing MCJ and transferring inmates to other facilities could not be accommodated without expanding other County detention facilities. Other county facilities are already operating over capacity and are not fully equipped to accommodate high-security inmates without additional improvements. They are also not fully-equipped to provide the specialized treatment for mental health, medical, substance use, and co-occurring disorder needs. The other custody/detention facilities are also located far from downtown Los Angeles, except for TTCF. Therefore, financial commitment would be necessary to increase capacity, and provide necessary treatment program infrastructure with the appropriate security level. This alternative would result in inefficient delivery of services, as treatment programs would have to be provided in various places rather one centralized location in proximity to other County facilities.</p>

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Table 7-6 Project Objectives Evaluation: No Project/Close MCJ/Transfer to Other County Facilities

Objective	Consistency Analysis
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 LEED Gold certification for the project.	

7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following four alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the Project but which may avoid or substantially lessen the one potential significant unavoidable traffic impact of the Project. These alternatives to the Proposed Project are presented to support informed decision making and public participation and are analyzed in detail in the following sections.

- No Project/Continued Use of Existing MCJ Facility
- Reduced Capacity CCTF
- Increased Capacity CCTF
- Alternative Site Location (Pitchess Detention Center)

The analysis of each of the Project alternatives identified below includes the following:

- A brief description of the alternative.
- An analysis of environmental impacts and a comparison to the possible impacts of the Proposed Project. Pursuant to Section 15126.6(d) of the State CEQA Guidelines, if an alternative would cause one or more significant effects in addition to those that would be caused by the Project, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the Project as proposed.
- An assessment of the alternative's ability to meet the Project objectives.

An EIR must identify an "environmentally superior" alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the Proposed Project and determined to be environmentally superior, similar, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the Proposed Project. Only one impact involving transportation/traffic was found to be potentially significant and unavoidable if the off-site parking Option 2 is selected and MM TRAN-6 cannot be implemented. Section 7.5 identifies the Environmentally Superior Alternative as the Reduced Capacity CCTF.

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7.4.1 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 TTCF 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.

7.4.1.1 AESTHETICS

Under this alternative, there would be no changes to the visual quality of the Project Site and no aesthetics impact would occur. Aesthetic impact determination is highly subjective, and no visually adverse impacts have been identified by the Proposed Project except for potential lighting impacts. Mitigation associated with the potential light spill-over onto sensitive receptors would not be required. Aesthetic impacts of this alternative would be environmentally superior to the Proposed Project. Aesthetics are not a significant and unavoidable impact of the Proposed Project.

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7.4.1.2 AIR QUALITY

Under this alternative, no changes to the MCJ facility would result, except for minor fixes where facility elements failed or were broken. Therefore, air quality impacts related to demolition, grading, and building construction would be eliminated. The Proposed Project would result in a minimal increase of 242 daily trips and approximately 2.3 percent in vehicle miles traveled, due to the minimal staffing increase. Therefore, this alternative would result in similar emissions related to mobile sources, such as NO_x, CO, PM₁₀, and PM_{2.5}, compared to the Proposed Project. Air quality impacts of this alternative would be environmentally superior to the Proposed Project. Air quality impacts are not a significant and unavoidable impact of the Proposed Project.

7.4.1.3 BIOLOGICAL RESOURCES

The Project Site is fully developed and only ornamental landscaping exists. Under this alternative, existing trees and plants would not be removed. Because no onsite landscaping would be removed or replaced, no direct or indirect impacts to biological resources would occur under this alternative. The SSPS Site is fully developed as a surface parking lot without any ornamental landscaping. The Vignes Lot contains some trees and vegetation near North Vignes Street. Biological impact of this alternative would be environmentally superior to the Proposed Project. Biological resources are not a significant and unavoidable impact of the Proposed Project.

7.4.1.4 CULTURAL RESOURCES

This alternative would not make any interior or exterior modification to the MCJ facility. Also, no ground disturbances would occur. Additionally, no physical modification to the SSPS Site or the Vignes Lot would be necessary. Therefore, no historic, archaeological, paleontological, or triable resources impact would occur. Cultural resources impact of this alternative would be environmentally superior to the Proposed Project. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.4.1.5 GEOLOGY AND SOILS

The Project Site, the SSPS Site, and the Vignes Lot are not underlain by a known Alquist-Priolo Earthquake Fault Zone; however, there are known active faults in the region that can cause ground shaking and other secondary hazardous seismic and geologic conditions that can adversely impact existing structures. No significant geologic and soils impacts have been identified under the Proposed Project provided that existing regulations and standard conditions are implemented prior to and during building construction. Under this alternative, no major grading or excavation would occur to cause unstable subsurface geologic conditions or significant erosion impact. This alternative would not involve exposure to geologic and seismic hazards, and implementation of required regulations would not be necessary. Geology and soils impact of this alternative would be environmentally superior to the Proposed Project. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

7. Alternatives to the Proposed Project

7.4.1.6 GREENHOUSE GAS EMISSIONS

The Proposed Project would result in a net decrease in GHG emissions of approximately 13,000 MTCO₂e per year under Option 1 or 2. Under this alternative, the MCJ would operate as is, and the net decrease would be lost. GHG impacts of this alternative would be environmentally inferior to the Proposed Project. GHG emissions are not a significant and unavoidable impact of the Proposed Project.

7.4.1.7 HAZARDS AND HAZARDOUS MATERIALS

The Project Site has a history of handling and storing hazardous materials, and the levels of certain chemicals of concerns exceed the threshold levels. Under this alternative, the identified existing hazardous conditions would not be remediated because there would be no demolition and grading. Without construction, the Project Site would remain as is, and although the chances of hazardous materials being released to the environment would be low, as there would not be any disturbance, the hazardous materials would remain onsite. The Proposed Project would provide opportunities to implement remediation in conjunction with demolition and grading activities associated with new construction, which would be a beneficial impact of the Proposed Project. Hazards and hazardous materials impacts of this alternative would be environmentally superior to the Proposed Project. Hazards and hazardous materials are not a significant and unavoidable impact of the Proposed Project.

7.4.1.8 HYDROLOGY AND WATER QUALITY

The Project Site is already developed and runoff is conveyed by surface streets or local storm drains to regional storm drainage facilities. Under this alternative, no changes to the drainage pattern or system would occur. The Proposed Project is not anticipated to reduce peak flow rate by implementing LID features and providing a treatment/infiltration system that reduces runoff volumes conveyed to drainage system. Therefore, it is anticipated that the Proposed Project would have beneficial impact on area hydrology and water quality at completion. However, under this alternative, no ground disturbances would occur, and compliance with the National Pollutant Discharge Elimination System General Construction Permit requirements and implementation of various best management practices to reduce water quality impact would not be necessary. Under this alternative, short-term construction impact would be eliminated. Hydrology and water quality impacts of this alternative would be environmentally superior to the Proposed Project. Hydrology and water quality are not a significant and unavoidable impact of the Proposed Project.

7.4.1.9 LAND USE AND PLANNING

Under this alternative, no changes to the existing MCJ facility would occur. The MCJ would continue its operation and no conflict with any applicable land use plan, policy, or regulations would occur. No land use plan or policy amendments are proposed under the Project and no conflicts with the local, regional, or state plans or policies have been identified. Land use and planning impact of this alternative would be less than significant similar to the Proposed Project. Land use and planning are not a significant and unavoidable impact of the Proposed Project.

7. Alternatives to the Proposed Project

7.4.1.10 NOISE

Under this alternative, no construction would occur; therefore, the short-term construction noise and vibration impact would be eliminated. The existing operation would continue, therefore, the long-term operational noise impact from the increased vehicle traffic (mobile sources) would also be eliminated (the net change in trip generation due to the Proposed Project is 242 daily trips). Noise impact of this alternative is environmentally superior to the Proposed Project. Noise is not a significant and unavoidable impact of the Proposed Project.

7.4.1.11 PUBLIC SERVICES

The City of Los Angeles Fire Department currently provides fire protection service for the existing MCJ facility. Although there would be less building area under this alternative compared to the Proposed Project, the new buildings would be constructed to meet the latest building and fire codes, equipped with better fire sprinkler and hydrant system than the current aging MCJ facility. Therefore, impacts to fire services would not change significantly under this alternative compared to the Proposed Project. The onsite police protection services are provided by LASD, and off-site services are provided by the City of Los Angeles Police Department. Environmental impacts associated with accommodating additional LASD staff are provided throughout this EIR, and no increase in LASD staff services would occur under this alternative, and no substantial adverse physical impacts are anticipated. There are no direct demands for school or library services by the existing MCJ facility and the indirect public services demands from the existing staffing would not change at the Project Site or within the City of Los Angeles. Therefore, no significant police, school, or library services impacts would occur. Public services impacts of this alternative would be environmentally similar to the Proposed Project. Public services are not a significant and unavoidable impact of the Proposed Project.

7.4.1.12 TRANSPORTATION AND TRAFFIC

The Proposed Project would result in a minimal increase of 242 daily trips and approximately 2.3 percent in vehicle miles traveled, due to the minimal staffing increase. However, cumulative traffic increases will result in a potential significant and unavoidable operational traffic impact at one intersection (i.e., Main Street & Alpine Street/North Vignes Street intersection) under Option 2 only. Therefore, as no off-site parking structure would be constructed under this alternative, the potentially significant operational impact at this one intersection under Option 2 would be eliminated. The MCJ would continue to be located in downtown Los Angeles in close proximity to TTCF and the LAC+USC Medical Center for support services. The short-term construction traffic impact would not occur, therefore, implementation of MM TRAN-1 through MM TRAN-5 for construction traffic impacts would not be necessary. Therefore, the transportation and traffic impact of this alternative is environmentally superior to the Proposed Project. Transportation and traffic are a potential significant and unavoidable impact of the Proposed Project, if Option 2 is selected and MM TRAN-6 cannot be implemented.

7. Alternatives to the Proposed Project

7.4.1.13 UTILITIES AND SERVICE SYSTEMS

The existing MCJ facility is served by outdated infrastructure that requires fixes, therefore, under this alternative, the existing utilities and service systems would continue to operate inadequately. The Proposed Project would improve and upgrade the existing utilities and service systems and reduce the water and sewer demands. Therefore, while alternative would not impact existing utilities, it would also remove any beneficial impacts of the Proposed Project. Utilities and service systems impact of this alternative is environmentally inferior to the Proposed Project. Utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.4.1.14 CONCLUSION

As summarized in Table 7-7, *Summary of No Project/Continued Use of Existing MCJ Facility Impacts*, 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. Therefore, this alternative is considered environmentally superior when compared to the Proposed Project.

Table 7-7 Summary of No Project/Continued Use of Existing MCJ Facility Impacts

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Aesthetics	No Impact	Less Than Significant After Mitigation	Less Than Project
Air Quality	No Impact	Less Than Significant After Mitigation	Less Than Project
Biological Resources	No Impact	Less Than Significant	Less Than Project
Cultural Resources	No Impact	Less Than Significant After Mitigation	Less Than Project
Geology and Soils	No Impact	Less Than Significant	Less Than Project
Greenhouse Gas Emissions	No Impact	Less Than Significant	Greater Than Project
Hazards and Hazardous Materials	Less Than Significant	Less Than Significant After Mitigation	Less Than Project
Hydrology and Water Quality	No Impact	Less Than Significant	Less Than Project
Land Use and Planning	Less Than Significant	Less Than Significant	Similar to Project
Noise	No Impact	Less Than Significant	Less Than Project
Public Services	Less Than Significant	Less Than Significant	Similar to the Project
Transportation and Traffic	No Impact	Significant and Unavoidable After Mitigation	Less Than Project
Utilities and Service Systems	Less Than Significant	Less Than Significant	Greater Than Project

Table 7-8, *Project Objectives Evaluation: No Project / Continued Use of Existing MCJ Facility*, shows that this alternative would not meet the objectives of the Proposed Project.

7. Alternatives to the Proposed Project

Table 7-8 Project Objectives Evaluation: No Project / Continued Use of Existing MCJ Facility

Objective	Consistency Analysis
<p>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.</p> <ol style="list-style-type: none"> 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. 	<p>Not Consistent: This alternative would not allow construction of a modern correctional detention treatment facility that incorporates the best industry practices in design to provide a safe environment for inmate-patients, visitors, and staff. 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 potentially preventable jail-related liability claims.</p>
<p>B. To prioritize the 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.</p> <ol style="list-style-type: none"> 5. Provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities onsite 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 onsite 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. 	<p>Not Consistent: 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. The existing IRC split between TTCF and MCJ will remain in use continuing the current intake and assessment processes. Female inmates are currently processed at CRDF. 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.</p>
<p>C. To provide treatment and detention capacity for both male and female inmate-patients requiring enhanced specialized access to mental and/or medical care.</p> <ol style="list-style-type: none"> 10. 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. 11. Maximize accessibility for the physically impaired. 12. Provide a flexible infrastructure that can respond to unforeseen changes in inmate populations. 	<p>Not Consistent: This alternative does not provide treatment and detention capacity to both male and female inmate-patients and does not conform to the applicable state and federal legal requirements and standards. The outdated existing facility limits the accessibility for the physically impaired and does not provide a flexibility to meet the future inmate population demands.</p>
<p>D. Maximize the financial and facility resources available to the County to construct, and maintain and operate a new treatment facility within the County's detention system.</p> <ol style="list-style-type: none"> 13. Minimize land acquisition, entitlement, and other siting costs. Avoid new land use conflicts by prioritizing the reuse of County-owned detention property. 	<p>Not Consistent: While the County would not be incurring expenses related to new detention facility construction, the outdated MCJ facility would not provide the opportunity to optimize the County's health and other rehabilitative services in an efficient manner would be lost.</p>

7. Alternatives to the Proposed Project

Table 7-8 Project Objectives Evaluation: No Project / Continued Use of Existing MCJ Facility

Objective	Consistency Analysis
14. 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.	
15. Minimize inmate-patient movement both within the facility and to off-site facilities by locating health and other rehabilitative services onsite where appropriate.	
16. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF 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.	
17. 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.	
18. Comply with the County's Energy and Environmental Policy and achieve LEED Gold certification for the project.	

7.4.2 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

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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).

7.4.2.1 AESTHETICS

Reduction in building space would slightly change the visual character of the new CCTF, but the overall design features and development quality would not change. Aesthetic impacts are subjective by nature. Therefore, because there are no sensitive receptors near the Project Site and no protected viewsheds would be blocked, the overall reduction in building height and mass would not necessarily represent less of an aesthetic impact. The Project Site boundaries would not change and the lighting impacts would be similar to that of the Proposed Project with implementation of PDF AE-1. Aesthetics impacts of this alternative are environmentally similar to the Proposed Project. Aesthetics is not a significant and unavoidable impact of the Proposed Project.

7.4.2.2 AIR QUALITY

Reduced building space at CCTF and the associated off-site parking structure would result in reduction in construction air quality impacts, and reduction in the number of beds would also result in decreased long-term operational air quality impacts related to transportation and energy use. Reduction in building space would require less energy consumption for building operation and reduction in bed capacity would also likely reduce the number of associated staff and visitors, therefore, result in less air quality impacts related to traffic volumes. However, reduction of the CCTF will require other County facilities to provide and operate treatment spaces, therefore, likely displace, not eliminate related air quality impacts to other locations. Air quality impacts of this alternative would be environmentally superior to the Proposed Project. Air quality impacts are not a significant and unavoidable impact of the Proposed Project.

7.4.2.3 BIOLOGICAL RESOURCES

Under this alternative, like the Proposed Project, all onsite landscaping would be removed prior to redevelopment. The SSPS Site does not have any landscaping and the Vignes Lot has some trees and vegetation along North Vignes Street. Reductions in building area and number of beds would not affect the overall biological impacts. Biological resources impacts of this alternative are environmentally similar to the Proposed Project. Biological resources are not a significant and unavoidable impact of the Proposed Project.

7.4.2.4 CULTURAL RESOURCES

Under this alternative, like the Proposed Project, all existing buildings would be removed and graded. It assumed that the area of off-site parking structure building footprint would be similar to the Proposed Project while the height would be shorter compared to the Proposed Project. Therefore, the potential impacts to subsurface archaeological and paleontological resources would be similar under this alternative. Cultural

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resources impacts of this alternative are environmentally similar to the Proposed Project. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.4.2.5 GEOLOGY AND SOILS

Under this alternative, like the Proposed Project, all existing buildings would be removed and graded and required to comply with the most recent building and seismic codes and regulations. It assumed that the area of off-site parking structure building footprint would be similar to the Proposed Project while the height would be shorter compared to the Proposed Project. Therefore, related geology and soils impacts would be similar to the Proposed Project. Geology and soils impacts of this alternative would be environmentally similar to the Proposed Project. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

7.4.2.6 GREENHOUSE GAS EMISSIONS

This alternative would contribute to global climate change through direct emissions of GHG from onsite area sources and vehicle trips generated. Indirect emissions from off-site energy production required for onsite activities, water use, and waste disposal would also occur. Therefore, an approximately 18 percent decrease in the building area and bed capacity would also result in decreased GHG emissions from onsite area sources, vehicle trips, VMT, and off-site energy production. GHG emissions impacts of this alternative are environmentally superior to the Proposed Project. GHG emissions are not a significant and unavoidable impact of the Proposed Project.

7.4.2.7 HAZARDS AND HAZARDOUS MATERIALS

The Project Site, the SSPS Site, and the Vignes Lot have a history of handling and storing hazardous materials. For the Project Site and the SSPS Site, although various subsurface investigations demonstrated that the levels of certain RECs do not exceed the threshold levels, there are areas where adequate investigations could not be performed before demolition. For the Vignes Lot, it was concluded that the levels of RECs do not exceed the threshold levels for a parking structure and/or non-custodial uses.

Under this alternative, the Project Site and the selected off-site parking structure option site would be remediated to below level of significance and would be required to comply with various applicable regulations and standards related to hazardous materials. Hazards and hazardous materials impacts of this alternative would be environmentally similar to the Proposed Project. Hazards and hazardous materials are not a significant and unavoidable impact of the Proposed Project.

7.4.2.8 HYDROLOGY AND WATER QUALITY

Under this alternative, the construction schedule would be shorter than the Proposed Project, and thus would result in slightly reduced construction water quality impacts. The majority of Project Site, SSPS Site, and the Vignes Lot are currently impervious; the Proposed Project requires achieving LEED Gold equivalent, thereby improving the hydrology and water quality conditions at both sites. Hydrology and water quality impacts of this alternative would be environmentally superior to the Proposed Project. Hydrology and water quality are not a significant and unavoidable impact of the Proposed Project.

7. Alternatives to the Proposed Project

7.4.2.9 LAND USE AND PLANNING

As with the Proposed Project, this alternative would allow the County to replace the existing MCJ facility while maintaining a downtown Los Angeles location near existing facilities such as the County Courts and TTCF. This alternative would also allow the County to meet the requirements of the BSCC and ADA. Land use and planning impacts of this alternative are environmentally similar to the Proposed Project. Land use and planning are not a significant and unavoidable impact of the Proposed Project.

7.4.2.10 NOISE

Reduction in building area would decrease the project-related construction noise impacts. The reduction in bed capacity would also result in decreased staff and visitor traffic volumes, thus reducing the operational traffic-related noise impact. Noise impacts of this alternative are environmentally superior to the Proposed Project. Noise is not a significant and unavoidable impact of the Proposed Project.

7.4.2.11 PUBLIC SERVICES

The CCTF would comply with the California Fire Code, and implementation of existing regulations and standard conditions would ensure that impacts related to fire service are not substantially different from that of the Proposed Project. The CCTF would be maintained and protected by the LASD and would not substantially impact the City's police protection capacity to result in expanded police facilities. School and library services demands are created primarily by growth-inducing development such as residential units, and development of a jail facility would not result in additional school service impact. Therefore, no changes to school or library services impacts would occur under this alternative compared to the Proposed Project. Under this alternative, impacts related to public services would be similar to that of the Proposed Project. Public services are not a significant and unavoidable impact of the Proposed Project.

7.4.2.12 TRANSPORTATION AND TRAFFIC

This alternative would have fewer traffic-related impacts than the Proposed Project. With the Proposed Project, cumulative traffic increases would result in a significant and unavoidable operational traffic impact at one intersection, under Option 2 only. Total traffic volumes generated by the Proposed Project would be reduced by approximately 18 percent under this alternative, however, the significant impact under Option 2 would remain. Therefore, operational traffic impacts would be less under this alternative compared to the Proposed Project, though a potentially significant impact under Option 2 could still occur if this option is selected and MM TRAN-6 cannot be implemented.

Reduction in building size would slightly reduce construction duration. As with the Proposed Project, construction-related traffic impacts would be managed through the implementation of MM TRAN-1 through MM TRAN-5 and impacts would be reduced to a less than significant level. Under this alternative, the number of beds would be reduced from 3,885 to 3,200 beds by 685 beds, and the number of staffing would be reduced from 2,245 to 1,850, a reduction of 1,350. Therefore, this alternative would likely reduce overall traffic in the traffic study area, it is anticipated that the reduced capacity alternative would likely reduce the one potentially significant and unavoidable impact under Option 2. Transportation and traffic impacts of this

7. Alternatives to the Proposed Project

alternative would be environmentally superior to the Proposed Project. Transportation and traffic are a significant and unavoidable impact of the Proposed Project.

7.4.2.13 UTILITIES AND SERVICE SYSTEMS

There would approximately 18 percent fewer employees and inmates under this alternative compared to the Proposed Project. Therefore, this alternative would generate less wastewater and consume less water. The solid waste, electricity, and gas demands would also be reduced. Because the reduced building area would have no impact on the impervious area coverage, no changes to the stormwater volume would result under this alternative compared to the Proposed Project. The overall utilities and service systems demands would generally be less than the Proposed Project. Utilities and service systems impacts of this impact would be environmentally superior to the Proposed Project. Utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.4.2.14 CONCLUSION

As summarized in Table 7-9, the Reduced Capacity CCTF 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, and would be considered environmentally superior when compared to the Proposed Project.

Table 7-9 Summary of Reduced Capacity CCTF Impacts

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Aesthetics	Less Than Significant	Less Than Significant	Less Than Project
Air Quality	Less Than Significant	Less Than Significant After Mitigation	Less Than Project
Biological Resources	Less Than Significant	Less Than Significant	Similar To Project
Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar To Project
Geology and Soils	Less Than Significant	Less Than Significant	Similar To Project
Greenhouse Gas Emissions	Less Than Significant	Less Than Significant	Less Than Project
Hazards and Hazardous Materials	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar To Project
Hydrology and Water Quality	Less Than Significant	Less Than Significant	Less Than Project
Land Use and Planning	Less Than Significant	Less Than Significant	Similar to Project
Noise	Less Than Significant	Less Than Significant	Less Than Project
Public Services	Less Than Significant	Less Than Significant	Similar To Project
Transportation and Traffic	Less Than Significant After Mitigation	Significant and Unavoidable After Mitigation	Less than Project
Utilities and Service Systems	Less Than Significant	Less Than Significant	Less Than Project

7. Alternatives to the Proposed Project

Table 7-10, *Project Objectives Evaluation: Reduced Capacity CCTF*, shows that this alternative would meet all of the project objectives, but not to the degree achieved by the Proposed Project.

Table 7-10 Project Objectives Evaluation: Reduced Capacity CCTF

Objective	Consistency Analysis
<p>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.</p> <ol style="list-style-type: none"> 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. 	<p>Partially Consistent: 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. However, 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.</p>
<p>B. To prioritize the 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.</p> <ol style="list-style-type: none"> 5. Provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities onsite 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 onsite 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. 	<p>Partially Consistent: This alternative would allow 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. This alternative would provide both treatment program space and clinical staff resources at the housing-unit level; co-locate MOSH, CTC, and medical clinic for efficiency; and reduce recidivism. However, the reduced capacity would require the remaining 685 inmate-patients to be housed at other County facilities, which may or may not be able to provide a comprehensive approach to health care.</p>
<p>C. To provide treatment and detention capacity for both male and female inmate-patients requiring enhanced specialized access to mental and/or medical care.</p> <ol style="list-style-type: none"> 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. 	<p>Partially Consistent: This alternative would provide treatment and detention capacity to both male and female inmate-patients while conforming to the applicable state and federal legal requirements and standards, including BSCC and ADA. At completion, the new CCTF would maximize accessibility for the physically impaired and provide flexibility to meet the future inmate population demands. However, the treatment and detention capacity under this alternative would not meet the anticipated demands of 3,885 inmate-patient beds, resulting in inadequate capacity.</p>

7. Alternatives to the Proposed Project

Table 7-10 Project Objectives Evaluation: Reduced Capacity CCTF

Objective	Consistency Analysis
<p>D. Maximize the financial and facility resources available to the County to construct, and maintain and operate a new treatment facility within the County's detention system.</p> <p>12. Minimize land acquisition, entitlement, and other siting costs. Avoid new land use conflicts by prioritizing the reuse of County-owned detention property.</p> <p>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.</p> <p>14. Minimize inmate-patient movement both within the facility and to off-site facilities by locating health and other rehabilitative services onsite where appropriate.</p> <p>15. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF 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.</p> <p>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.</p> <p>17. Comply with the County's Energy and Environmental Policy and achieve LEED Gold certification for the project.</p>	<p>Partially Consistent: 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. The Project Site's proximity to downtown Los Angeles courts, TTCF, LAC+USC Medical Center, and other County and community support services would be maintained. This alternative would provide optimal access from within the new CCTF and TTCF, comply with the County's Energy and Environmental Policy, and achieve LEED Gold equivalent certification for the project. The long-term operations and maintenance costs would be partially optimized, because it would serve 20 percent fewer patient-inmates than the Proposed Project, and that population would need to be served at other County detention facilities.</p>

7.4.3 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.

7.4.3.1 AESTHETICS

This alternative would have similar aesthetics impact as the Proposed Project. The increased capacity CCTF would increase building area, therefore, the bulk, height, and mass of the buildings could increase. However, as the project site boundaries would not change, no changes to scenic resources would occur and there are no adjacent sensitive receptors to be adversely affected by this alternative. Although the buildings would be

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visible, visibility alone does not constitute adverse aesthetics impact. Therefore, visual character under this alternative would be similar to that of the Proposed Project. Aesthetics are not a significant and unavoidable impact of the Proposed Project.

7.4.3.2 AIR QUALITY

Under this alternative, the construction period air quality impact would be slightly greater than that of the Proposed Project, as the building area would increase by approximately 300,000 square feet. With the increased bed capacity and staffing, the number of visitor trips and inmate transferring trips as well as staff commuting trips would increase. Therefore, the associated air quality impacts from transportation sources would increase. Operational air emissions from the energy (natural gas) and area sources (consumer products, and architectural coatings used for routine maintenance) would also increase under this alternative due to increased building area and inmate-patients to serve. Therefore, this alternative would have greater construction and operational air quality impacts compared to the Proposed Project. Air quality impacts of this alternative are environmentally inferior to the Proposed Project. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.4.3.3 BIOLOGICAL RESOURCES

As with the Proposed Project, all onsite trees and landscaping would be removed under this alternative. The County would be required to comply with the MBTA, and no significant biological resources impact is anticipated. Biological resources impacts of this alternative would be environmentally similar to the Proposed Project. Biological resources are not a significant and unavoidable impact of the Proposed Project.

7.4.3.4 CULTURAL RESOURCES

Under this alternative, like the Proposed Project, all existing buildings would be removed and graded. The building sizes and height of the CCTF would be slightly greater than that of the Proposed Project. However, the limits and depth of grading would not change substantially from the Proposed Project. The same mitigation measures would be required under this alternative. Cultural resources impacts of this alternative are environmentally similar to the Proposed Project. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.4.3.5 GEOLOGY AND SOILS

Under this alternative, like the Proposed Project, all existing buildings would be removed and graded. It is anticipated that the area of building footprint would be similar to that of the Proposed Project, and it would also be required to comply with the most recent building and seismic codes and regulations. As with the Proposed Project, provided that applicable regulatory requirements are implemented, no significant geologic or soils impacts would occur. Geology and soils impacts of this alternative are environmentally similar to the Proposed Project. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

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7.4.3.6 GREENHOUSE GAS EMISSIONS

This alternative would contribute to global climate change through direct emissions of GHG from onsite area sources and transportation. Indirect emissions from off-site energy production required for onsite activities, water use, and waste disposal would also occur. Therefore, the increase in bed capacity and associated indirect emissions from off-site energy production would result in increased GHG emissions. The number of related visitor and staff trips would also increase, therefore increasing GHG emissions from transportation sources from the Proposed Project. GHG emissions impacts of this alternative are environmentally inferior to the Proposed Project. GHG emissions are not a significant and unavoidable impact of the Proposed Project.

7.4.3.7 HAZARDS AND HAZARDOUS MATERIALS

The Project Site, the SSPS Site, and the Vignes Lot have a history of handling and storing hazardous materials. For the Project Site and the SSPS Site, although various subsurface investigations demonstrated that the levels of certain RECs do not exceed the threshold levels, there are areas where adequate investigations could not be performed before demolition. For the Vignes Lot, it was concluded that the levels of RECs do not exceed the threshold levels for a parking structure and/or non-custodial uses.

Under this alternative, the Project Site and the selected off-site parking structure option site would be remediated to below level of significance and would be required to comply with various applicable regulations and standards related to hazardous materials. Hazards and hazardous materials impacts of this alternative would be environmentally similar to the Proposed Project. Hazards and hazardous materials are not a significant and unavoidable impact of the Proposed Project.

7.4.3.8 HYDROLOGY AND WATER QUALITY

Under this alternative, the number of beds would increase, however, while the building area and height would slightly increase, the area of impervious area would not change substantially different from the Proposed Project as the building footprint area would be similar to that of the Proposed Project. Therefore, the volume and rate of stormwater runoff would be similar to that of the Proposed Project. Moreover, as with the Proposed Project, this alternative would be developed to achieve LEED Gold equivalent rating to improve existing stormwater quality. Under this alternative, the construction schedule would be similar to the Proposed Project and similar construction BMPs would be required. This alternative would have similar construction hydrology and water quality impact as the Proposed Project. Hydrology and water quality are not a significant and unavoidable impact of the Proposed Project.

7.4.3.9 LAND USE AND PLANNING

Under this alternative, 4,860 beds would be provided, approximately 25 percent more than the Proposed Project, consistent with Option 1B proposed by the 2014 Vanir Report. As with the Proposed Project, this alternative would allow the County to replace the existing MCJ facility while maintaining a downtown Los Angeles location near existing facilities such as the County Courts and TTCF. This alternative would not conflict with any applicable local, regional, or state land use plans and policies or surrounding uses. Land use

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and planning impacts of this alternative are environmentally similar to the Proposed Project. Land use and planning are not a significant and unavoidable impact of the Proposed Project.

7.4.3.10 NOISE

The construction noise would be greater than the Proposed Project, as the building area would increase from 2.4 million to 2.7 million square feet. The operational noise from mobile sources would slightly increase, as the visitor and staff trips would increase from the Proposed Project. Construction and operational noise impacts of this alternative would be environmentally inferior to the Proposed Project. Noise is not a significant and unavoidable impact of the Proposed Project.

7.4.3.11 PUBLIC SERVICES

As with the Proposed Project, police, school, and library services would not be directly impacted under this alternative. No additional staffing would be required under this alternative to have indirect impact on public services demands. Under this alternative, public service impacts would be environmentally similar to the Proposed Project. Public services are not a significant and unavoidable impact of the Proposed Project.

7.4.3.12 TRANSPORTATION AND TRAFFIC

Transportation and traffic impacts during construction would not change substantially from the Proposed Project. Although the construction period would longer than the Proposed Project, implementation of MM TRAN-1 through MM TRAN-5 would ensure that construction related traffic impacts are reduced to a less than significant level. The increase in number of beds and staffing would increase the related visitor and commuting trips during operation, therefore, increase the traffic impacts in the traffic study area. This alternative would increase the potentially significant and unavoidable impact related to traffic under Option 2. Transportation and traffic impacts of this alternative are environmentally inferior to the Proposed Project. However, it is noted that increase in bed capacity would allow more inmate-patients to receive treatments near local community hospitals and LAC+USC Medical Center, resulting in decreased trips and less transportation resources for timely treatment services. Transportation and traffic are potentially a significant and unavoidable impact of the Proposed Project under Option 2.

7.4.3.13 UTILITIES AND SERVICE SYSTEM

Under this alternative, the maximum bed capacity would increase from 3,885 beds to 4,860, an increase of approximately 25 percent. Staffing would also increase from 2,445 to 2,809. Therefore, this alternative would result in increased water, sewer, and solid waste demands to serve the increased population. Utilities and service systems impacts of this alternative would be environmentally inferior to the Proposed Project. Utilities and service systems are not a significant and unavoidable impact of the Proposed Project.

7.4.3.14 CONCLUSION

As summarized in Table 7-11, 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

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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.

Table 7-11 Summary of Increased Capacity CCTF Impacts

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Aesthetics	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to Project
Air Quality	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Greater Than Project
Biological Resources	Less Than Significant	Less Than Significant	Similar to Project
Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to Project
Geology and Soils	Less Than Significant	Less Than Significant	Similar to Project
Greenhouse Gas Emissions	Less Than Significant	Less Than Significant	Greater Than Project
Hazards and Hazardous Materials	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to Project
Hydrology and Water Quality	Less Than Significant	Less Than Significant	Similar to Project
Land Use and Planning	Less Than Significant	Less Than Significant	Similar to Project
Noise	Less Than Significant	Less Than Significant	Greater Than Project
Public Services	Less Than Significant	Less Than Significant	Similar to Project
Transportation and Traffic	Significant and Unavoidable After Mitigation	Significant and Unavoidable After Mitigation	Greater Than Project
Utilities and Service Systems	Less Than Significant	Less Than Significant	Greater Than Project

Table 7-12, *Project Objectives Evaluation: Increased Capacity CCTF*, shows that this alternative would meet all of the project objectives.

Table 7-12 Project Objectives Evaluation: Increased Capacity CCTF

Objective	Consistency Analysis
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.	Consistent: 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.
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.	

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Table 7-12 Project Objectives Evaluation: Increased Capacity CCTF

Objective	Consistency Analysis
<p>B. To prioritize the 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.</p> <p>5. Provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities onsite to achieve proximity and to focus on the highest risk inmate-patients with such treatment needs.</p> <p>6. Provide both treatment program space and clinical staff resources at the Housing Unit level.</p> <p>7. Strive to reduce recidivism by providing onsite mental health, medical, and substance use disorder treatment services, educational programs, and re-entry support resources.</p> <p>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.</p>	<p>Consistent: This alternative would allow 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. This alternative would provide both treatment program space and clinical staff resources at the housing-unit level; co-locate MOSH, CTC, and medical clinic for efficiency; and reduce recidivism.</p>
<p>C. To provide treatment and detention capacity for both male and female inmate-patients requiring enhanced specialized access to mental and/or medical care.</p> <p>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.</p> <p>10. Maximize accessibility for the physically impaired.</p> <p>11. Provide a flexible infrastructure that can respond to unforeseen changes in inmate populations.</p>	<p>Consistent: This alternative would provide treatment and detention capacity to both male and female inmate-patients while conforming to the applicable state and federal legal requirements and standards, including BSCC and ADA. At completion, the new CCTF would maximize accessibility for the physically impaired and provide flexibility to meet future inmate population demands.</p>
<p>D. Maximize the financial and facility resources available to the County to construct, and maintain and operate a new treatment facility within the County's detention system.</p> <p>12. Minimize land acquisition, entitlement, and other siting costs. Avoid new land use conflicts by prioritizing the reuse of County-owned detention property.</p> <p>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.</p> <p>14. Minimize inmate-patient movement both within the facility and to off-site facilities by locating health and other rehabilitative services onsite where appropriate.</p> <p>15. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF 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.</p>	<p>Consistent: 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. However, long-term operational costs would be increased as compared to the Proposed Project due to the increase in staffing. The Project Site's proximity to downtown Los Angeles courts, TTCF, LAC+USC Medical Center, and other County and community support services would be maintained. This alternative would provide optimal access from within the new CCTF and TTCF, comply with the County's Energy and Environmental Policy, and achieve a minimum of LEED Gold equivalent certification for the project. The long-term operations and maintenance costs would be optimized, as the need to transfer and rely on other County system detention and treatment facilities would be minimized.</p>

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Table 7-12 Project Objectives Evaluation: Increased Capacity CCTF

Objective	Consistency Analysis
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 LEED Gold certification for the project.	

7.4.4 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 ADP 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.

7.4.4.1 AESTHETICS

The area surrounding PDC is rural community with ridgelines and hill views. There are no designated state scenic highways in the area. The nearest eligible, but not officially designated, state scenic highway is SR-126, approximately 1.6 miles east of PDC (Caltrans 2015). Due to the distance and topography, the PDC site is not readily visible from SR-126. Development under this alternative would not substantially damage scenic resources. The new CCTF would be developed on the existing PDC site and—considering the size of the PDC site, 2,620 acres—the 2.4 million-square-foot CCTF would not have high rise buildings. The new facilities would be more spread out low-rise buildings. PDC is in a low density area without much nighttime lighting except for lighting from the current PDC uses, and this alternative would create additional light for security purposes. The PDC site is in an urban census tract, therefore, is in Lighting Zone 3 as with the Project Site. Although residential uses are west of I-5, as with the Proposed Project, implementation of a Lighting Plan (PDF AE-1) would ensure that lights are directed toward the interior or the site not to cause

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adverse impact on adjacent sensitive receptors. Aesthetics impacts of this alternative are environmentally similar to the Proposed Project. Aesthetics are not a significant and unavoidable impact of the Proposed Project.

7.4.4.2 AIR QUALITY

Under this alternative, air emissions associated with demolition of the existing MCJ facility would be eliminated, although all other construction related emissions would occur. It should also be noted high-rise building development would not be necessary, and construction duration could also be shortened. And construction of an off-site parking at would not be necessary. Therefore, construction-related air quality impacts would be less than the Proposed Project and would not exceed the SCAQMD's emissions threshold level.

Operational emissions would be greater due to increased VMT. The greatest operational emission source is from transportation. The VMT analysis for the Proposed Project assumed average one-way trip length of 28 miles for employees and 25 miles for visitors. The one way trip length was estimated based on the regional and local roadway network from the originating zip codes to the Project Site. The PDC is approximately 41 miles from the Project Site to the northwest in the unincorporated community of Castaic, and is not served by various regional and local roadway network as the Project Site. It is anticipated that greater one-way trip lengths for both visitor and staff would occur under this alternative. Additionally, the CCTF is centrally located to many courts inside of the basin, and moving the CCTF 41 miles away would require additional buses to transport inmates. However, other operational air quality emissions sources such as the size, capacity, and staffing would not change.

This alternative would decrease construction-related air quality impact because extensive building demolition would not be necessary, but would increase long-term air quality impacts related to transportation sources. Therefore, air quality impacts of this alternative are environmentally superior to the Proposed Project for construction and inferior to the Proposed Project for operation due to significant and unavoidable air quality impacts associated with the increase in VMT. Air quality is not a significant and unavoidable impact of the Proposed Project.

7.4.4.3 BIOLOGICAL RESOURCES

PDC is in a rural area surrounded by mountains and ridgelines in Santa Clarita Valley. Not all areas of the PDC site are developed, and there are open space areas on and near the PDC site. Therefore, additional habitat assessment would be required to determine the presence of natural habitats and special status species. Although the PDC site is developed with County facilities and implementation of regulatory requirements, project design features, and mitigation measures would potentially reduce impacts to a less than significant level, because this alternative would potentially disturb more previously undisturbed ground, biological resources impacts of this alternative are considered environmentally inferior to the Proposed Project. Biological resources are not a significant and unavoidable impact of the Proposed Project.

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7.4.4.4 CULTURAL RESOURCES

The PDC site contains areas that have not been previously developed. Impacts to cultural resources could potentially be greater under this alternative because the grading area for this alternative would be greater compared to the Proposed Project. However, as with the Proposed Project, mitigation measures such as construction monitoring, testing, archiving, and recovery of any found resources prior to development of the site would be implemented to reduce impacts to a less than significant level. Because this alternative would potentially disturb more previously undisturbed ground, cultural resources impacts of this alternative are considered environmentally inferior to the Proposed Project. Cultural resources are not a significant and unavoidable impact of the Proposed Project.

7.4.4.5 GEOLOGY AND SOILS

Under this alternative, like the Proposed Project, only limited or no demolition of existing buildings would be required. However, the 2,620-acre site contains slopes and hillsides that could require extensive excavation and soil hauling. As with the Proposed Project, this alternative would be required to comply with the most recent building and seismic codes and regulations. Geology and soils impacts of this alternative are environmentally inferior to the Proposed Project. Geology and soils are not a significant and unavoidable impact of the Proposed Project.

7.4.4.6 GREENHOUSE GAS EMISSIONS

Under this alternative, longer inmate transport trips, employee trips, and visitor trips are anticipated. GHG emissions impacts of this alternative are environmentally inferior to the Proposed Project. GHG emissions are not a significant and unavoidable impact of the Proposed Project.

7.4.4.7 HAZARDS AND HAZARDOUS MATERIALS

The Project Site has a history of handling and storing hazardous materials and the levels of certain chemicals of concern exceed the threshold levels. The PDC site is 2,620 acres and consists of different facilities developed at different times. The north facility was originally built in 1987, the east facility in 1951, the south facility in 1971, and the North County Correctional Facility in 1990. The site also contains a cogeneration plant and oil derricks that could potentially result in subsurface contamination. Other sources of concern are the historical and current use of the site for agriculture and the Peter Pitchess Landfill. According to the Geotrack search, there are two open cases for potential impacts on groundwater. Therefore, although no site-specific investigation has been performed, as with the Proposed Project, it is anticipated that recognized environmental concerns that could require remediation could be present. This alternative site is in a Very High Fire Hazard Severity Zone mapped by the California Department of Forestry and Fire Protection. Overall, hazards and hazardous materials impacts of this alternative are environmentally inferior to the Proposed Project. Hazards and hazardous materials are not a significant and unavoidable impact of the Proposed Project.

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7.4.4.8 HYDROLOGY AND WATER QUALITY

Under this alternative more pervious area would be converted to impervious surfaces; therefore, the volume and rate of stormwater runoff could change. The PDC site is in Zone A and Zone D of the FEMA's Flood Insurance Rate Map. Zone A is areas in which no base flood elevations are determined, and Zone D is areas in which flood hazards are undetermined but possible. The PDC site also contains areas with boundaries dividing Special Flood Hazard Areas with different base flood elevations, flood depths, or flood velocities. Castaic Canyon, Charlie Canyon Creek, and Tapia Canyon are on or near the PDC site, with 1 percent annual chance of flood discharge. Therefore, under this alternative, greater hydrology and water quality impacts are anticipated. Hydrology and water quality impacts of this alternative are environmentally inferior to the Proposed Project. Hydrology and water quality are not a significant and unavoidable impact of the Proposed Project.

7.4.4.9 LAND USE AND PLANNING

As with the Project Site, the PDC site is also developed with various jail and correctional facilities for Los Angeles County. The 2,620-acre site contains utility easements owned by oil and utility companies that could create land use conflicts. Land use and planning impacts of this alternative are environmentally inferior to the Proposed Project. Land use and planning are not a significant and unavoidable impact of the Proposed Project.

7.4.4.10 NOISE

Under this alternative, noise impacts during demolition would be eliminated, and the overall duration of the construction would be shortened, resulting in less overall construction noise impact compared to the Proposed Project. Operational noise impacts would be similar to the Proposed Project. Noise impacts of this alternative are environmentally similar to the Proposed Project. Noise is not a significant and unavoidable impact of the Proposed Project.

7.4.4.11 PUBLIC SERVICES

Under this alternative, greater fire protection impacts are anticipated because more building area would be introduced to the very high fire hazards zone. Although the CCTF would adhere to the applicable fire code and provide fire sprinkler system and emergency access, the potential fire services impact would be greater compared to the Proposed Project. As with the Proposed Project, the PDC site would be served by the County Sheriff's Department and would not substantially increase the police protection services demands. School and library services needs increase from growth-inducing projects such as residential development. The CCTF would not impact school or library services. Public services impacts of this alternative are environmentally inferior to the Proposed Project due to increased fire services impact. Public services are not a significant and unavoidable impact of the Proposed Project.

7.4.4.12 TRANSPORTATION AND TRAFFIC

Under alternative, demolition of MCJ facilities would not be necessary, which would result in a decrease in construction-related trips. However, an increase in vehicle trips and longer travel distances are anticipated

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under this alternative, because the PDC site is not near the County courts, TTCF, and community medical support facilities such as LAC-USC Medical Center. Visitor and staffs would likely have to drive greater distance compared to downtown Los Angeles, where population is more concentrated. These trips would occur away from the local traffic study area roadway network and an off-site parking structure at the SSPS Site or Vignes Lot would not be necessary. Therefore, while this alternative would eliminate the significant and unavoidable impact to one intersection under Option 2, there is a potential that intersections near PDC would be impacted. Transportation and traffic impacts of this alternative are environmentally inferior to the Proposed Project. Transportation and traffic are a potentially significant and unavoidable impact of the Proposed Project if Option 2 is selected and MM TRAN-6 cannot be implemented.

7.4.4.13 UTILITIES AND SERVICE SYSTEMS

The number of beds, staff, and total building area would be the same under this alternative. Therefore, this alternative would have similar wastewater, water, and solid waste demands compared to the Proposed Project during operation. However, the existing utility infrastructure at PDC is likely not capable of supporting a new 3,885 bed facility, IRC and CTC. The electrical system, plumbing and wastewater systems for PDC would likely require substantial upgrades. Additionally, the PDC site has utility easements owned by oil and utility companies, and construction of new utility connections could be difficult. Utilities and service systems impacts of this alternative are environmentally inferior to the Proposed Project. Utilities and services systems are not a significant and unavoidable impact of the Proposed Project.

7.4.4.14 CONCLUSION

As summarized in Table 7-13, the Alternative Site Location 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.

Table 7-13 Summary of Alternative Site Location (Pitchess Detention Center) Impacts

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Aesthetics	Less Than Significant	Less Than Significant	Similar To Project
Air Quality	Significant and Unavoidable After Mitigation	Less Than Significant After Mitigation	Construction: Less Than Project Operation: Greater Than Project
Biological Resources	Less Than Significant	Less Than Significant	Greater Than Project
Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Greater Than Project
Geology and Soils	Less Than Significant	Less Than Significant	Greater Than Project
Greenhouse Gas Emissions	Less Than Significant	Less Than Significant	Greater Than Project
Hazards and Hazardous Materials	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Greater Than Project
Hydrology and Water Quality	Less Than Significant	Less Than Significant	Greater Than Project
Land Use and Planning	Less Than Significant	Less Than Significant	Greater Than Project
Noise	Less Than Significant	Less Than Significant	Construction: Less Than Project Operation: Similar To Project

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Table 7-13 Summary of Alternative Site Location (Pitchess Detention Center) Impacts

Environmental Issue	Potential Significance of Alternative's Impact	Summary of Proposed Project Impacts	Comparison
Public Services	Less Than Significant	Less Than Significant	Greater Than Project
Transportation and Traffic	Less Than Significant After Mitigation	Significant and Unavoidable After Mitigation	Construction: Less Than Project Operation: Greater Than Project due to increased VMT although localized intersection impacts under Option 2 would be eliminated
Utilities and Service Systems	Less Than Significant	Less Than Significant	Greater Than Project

Table 7-14, *Project Objectives Evaluation: Alternative Site Location (Pitchess Detention Center)*, shows that this alternative would not meet the majority of the objectives of the Proposed Project.

Table 7-14 Project Objectives Evaluation: Alternative Site Location (Pitchess Detention Center)

Objective	Consistency Analysis
<p>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.</p> <ol style="list-style-type: none"> To provide a safe environment for inmate-patients, visitors, and staff. Reduce County exposure to preventable jail-related liability claims. Prevent and/or substantially reduce at-risk inmate-patients suicide. Design criteria that provide a more therapeutic environment with treatment centric features to enhance the lives of inmate-patients. Improve safety of public, staff, and inmate-patients through design and operational best practices that meet BSCC and applicable correctional standards. 	<p>Partially Consistent: This alternative would allow construction of a modern correction detention treatment facility that incorporates the best industry practices in care, safety and design features. However, 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 majority of PDC inmate population consists of low-medium inmates that are less likely to require mental health care and treatment facility. Therefore, the usefulness of the proposed CCTF in a centrally located location, and in close proximity to TTCF, would be restricted by its location.</p>
<p>B. To prioritize the 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.</p> <ol style="list-style-type: none"> Provide a comprehensive approach to health care that locates mental health, medical, and substance use disorder treatment facilities onsite to achieve proximity and to focus on the highest risk inmate-patients with such treatment needs. Provide both treatment program space and clinical staff resources at the Housing Unit level. Strive to reduce recidivism by providing onsite mental health, medical, and substance use disorder treatment services, educational programs, and re-entry support resources. 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. 	<p>Partially Consistent: This alternative would allow 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. This alternative would provide both treatment program space and clinical staff resources at the housing unit level; co-locate MOSH, CTC, and medical clinic for efficiency; and reduce recidivism. However, there would be a disconnect between the comprehensive and modernized facility and the inmate-patient population that the CCTF intends to serve and treat. Therefore, this alternative would not be as effective in the County's effort to reduce recidivism. The proposed CCTF would function better co-located with the TTCF as inmate-patients progress through treatment, they can transition into general population housing. The proposed CCTF benefits from proximity to the LAC+USC Medical Center as inmate-patients are routinely provided services not offered at the CCTF (specialty clinics and emergency room services).</p>

7. Alternatives to the Proposed Project

Table 7-14 Project Objectives Evaluation: Alternative Site Location (Pitchess Detention Center)

Objective	Consistency Analysis
	<p>Locating the CCTF away from LAC+USC Medical Center will require treatment at local community hospitals requiring additional staff to transport and provide security. 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. Locating the intake and release functions of inmates at PDC places these functions away from public transportation and downtown, potentially impacting the services available for inmates post release (lower level of community involvement, most community based organizations are located downtown).</p>
<p>C. To provide treatment and detention capacity for both male and female inmate-patients requiring enhanced specialized access to mental and/or medical care.</p> <p>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.</p> <p>10. Maximize accessibility for the physically impaired.</p> <p>11. Provide a flexible infrastructure that can respond to unforeseen changes in inmate populations.</p>	<p>Partially Consistent: This alternative would provide treatment and detention capacity to both male and female inmate-patients while conforming to the applicable state and federal legal requirements and standards, including BSCC and ADA. However, it would not be able to meet future demands because the system would be further strained by being located far from a County hospital if there were any kind of future epidemic that required transporting increasing number of inmate-patients to other hospitals. Therefore, it could not maximize accessibility for the physically impaired and provide flexibility to meet future inmate population demands.</p>
<p>D. Maximize the financial and facility resources available to the County to construct, and maintain and operate a new treatment facility within the County's detention system.</p> <p>12. Minimize land acquisition, entitlement, and other siting costs. Avoid new land use conflicts by prioritizing the reuse of County-owned detention property.</p> <p>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.</p> <p>14. Minimize inmate-patient movement both within the facility and to off-site facilities by locating health and other rehabilitative services onsite where appropriate.</p> <p>15. Locate the CTC and the Medical Clinic for optimal access from within the new CCTF 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.</p> <p>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.</p> <p>17. Comply with the County's Energy and Environmental Policy and achieve LEED Gold certification for the project.</p>	<p>Partially Consistent: This alternative would avoid land acquisition, entitlement, and other siting costs and prevent new land use conflicts by using the available land at PDC. However, the Project Site's proximity to downtown Los Angeles courts, TTCF, LAC+USC Medical Center, and other County and community support services would not be maintained. Locating the CCTF away from downtown would increase travel time and delay critical treatment for inmate-patients. Also, moving the CCTF away from TTCF and the existing IRC would create operational challenges that could potentially increase County liabilities and require duplication of resources for intake and discharge compared to the Proposed Project. The proposed CCTF benefits from co-location with the TTCF and in close proximity to LAC+USC Medical Center, and this alternative would not allow maximization of existing County facilities. This alternative would comply with the County's Energy and Environmental Policy and achieve a LEED Gold equivalent certification.</p>

7. Alternatives to the Proposed Project

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” alternative is environmentally superior to the Proposed Project, the environmentally superior development alternative must be identified. Two alternatives have been identified as “environmentally superior” to the Proposed Project:

- No Project/Continued Use of Existing MCJ Facility
- Reduced Intensity CCTF

The No Project/Continued Use of Existing MCJ Facility has been identified as being environmentally superior to the Proposed Project. Table 7-6 summarizes this alternative’s environmental impacts. However, this alternative will not meet any of the objectives established for the Proposed Project, as discussed in Table 7-7, *Project Objectives Evaluation: No Project / Continued Use of Existing MCJ Facility*.

The Reduced Intensity CCTF has also been identified as the environmentally superior alternative. As shown in Table 7-9, *Summary of Reduced Capacity CCTF Impacts*, 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. It would likely eliminate significant impact on traffic by reduce impacts to one impacted intersection. All mitigation measures for the Proposed Project would be implemented. However, this alternative would only partially meet the Project objectives, as discussed in Table 7-13, *Evaluation of Project Objectives: Reduced Capacity CCTF*. The reduction in capacity would not meet the County’s mental-health, medical, and substance use disorder treatment goals. This alternative would require the remaining 685 inmate-patients to be treated elsewhere at other County facilities that lack adequate capacity for proper treatment services, therefore, this alternative is not practical and not feasible.

7.5.1 References

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